Financial Intelligence Unit of Iceland

goAML

Web User Guide v1.06

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Change history

V 0.92
Various corrections to text.
Information added on different report types.
New appendix section

V 1.0
Various corrections to text.
Information added on Not My Client specifications for Person, Account, Entity.
Changes to registration of reports to reflect final Schema.
Updated Business Rules.

V1.01
Minor text corrections
More details added regarding My goAML.
Adjustments made to XML Business rule no. 5

V1.02
Minor text corrections
Text related to Multiparty Transactions updated
New Account Type – Loan added (see account types in the appendix)

V1.03
Business rule no 1 made INACTIVE
Adjustments made to XML Business rule no. 4
Changes made to descriptions of Transmode Codes to make it easier to differentiate between them.
Text regarding automatic notification and messaging from goAML updated.

V1.04
Updated to reflect changes in the GUI of goAML Web.
Business rule no. 6 added.

V1.05
Information added regarding XML transaction upload in Web reports and different languages.
Text related to MultiParty transactions updated.

V1.06
Updated to reflect changes in the GUI of goAML Web.

Getting started

goAML is not freely accessible and the first thing to do is register on the website.

It is possible to switch between English and Icelandic language version of the web. It should be noted that only the reporting process of the web interface has been translated to Icelandic.

At this time it is not possible to register as an individual for reporting so all persons that register need to be a part of an organization. Individuals who want to report to FIU-ICE should contact FIU-ICE directly.

It is possible to register as a *Reporting Entity, Stakeholder* or *Supervisory Body*.

<u>Do not register as a Stakeholder or Supervisory Body without the prior approval of FIU-ICE</u>

It should be noted that when registering an organization it is also necessary to enter details about one person that will be the **Administrator** for that organization.

The **Administrator** should be decided carefully since the **Administrator** will have more access and obligations then those who register later. However it is possible for that **Administrator** to give more rights to other members of the organization such as full administrator rights**.**

The role of an **Administrator** is covered in detail here.

The login window also has a help feature for users that have forgotten their password and a link will be sent to an email address with instructions on how to change the password.

An **Administrator** can also reset the password of a user within goAML Web for his organization and a temporary password will be sent to the registered email of that user.

The temporary password can only be used once and must be changed when logging in.

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Registration of an Organisation

The use of the term „*Organisation*" in goAML is very broad and all legal entities are considered an organization even though they just employ one person.

In general the fields that are marked in **red** or with a * are mandatory.

The type of organization should first be selected :

Reporting Entity – An organization that has legal obligations to report suspicion of money laundering to FIU-ICE. Organization that do not have such legal obligation should also register as a reporting entity.

Stakeholder – Various domestic competent authorities. An example would be various police districts.

Supervisory Body – An organization that supervises certain fields with regard to anti-money laundering. Examples would be the Tax authorities and the FSA. This could also be a civil organization that has legal obligations to monitor a certain professional category of work.

When registering a new organization it is necessary to register two persons associated with that organization :

- **Contact Person** – This is the person responsible for anti-money laundering within the organization, for example the Chief Complaince Officer within larger organizations.
- **Administrator** – This person has certain obligations to other users of goAML within that organization, including user management.

Fields to be filled out

Registering Organization

Organization Business Type – The type of organization that is being registered is selected from the drop-down menu.

Name – The name of the organization being registered. This would be the legal name of the entity.

Acronym – A shortened version of the legal name, preferrably something known or used by others outside of the organization.

Is financial? – If the Reporting Entity has a registered SWIFT/BIC code then this should be „Yes" otherwise this should be set to „No". By setting this to „Yes" the SWIFT/BIC field also becomes mandatory.

Incorp. Num – This is the incorporation number of the organization (if Icelandic, SSN).

Contact Person – This should be the highest ranking officer of the organization responsible for anti-money laundering.

Email – This is the email address of the organisation.

This is the only email address that will receive notifications when new messages are available on the *Message Board (MB)*.

When a Web Report is accepted or rejected by FIU-ICE a message is sent to the MB to acknowledge this and not with email to the particular user who submitted the Web Report. With that in mind it is worth considering registering an email address that is accessible to more then one person.

Phone – The main phone number of the organization should also be registered.

If you are unsure of your organization type or do not see anything listed that matches please contact FIU-ICE.

Registering Person / Administrator

The fields are self-explanatory and relate to that particular *Admin/User* within the organization.

Administrator

In order for a person to be able to register as part of an organization the person must know the unique *Organization ID* of that organization. The **Administrator** of an organization can provide this ID.

User (Reporting Entity)

For phone both landline and mobile phones should be registered.

Once this is done, preview the information from the left side toolbar, fill in the CAPTCHAand submit.
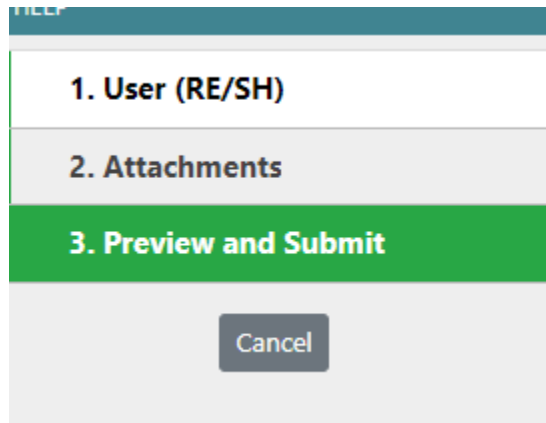
If the request was accepted a message will appear confirming the submission of the request :

An email will be sent to the email address provided during registration for confirmation.

This email address is also the recipient for a number of automatic notifications from goAML specific to the user.

That includes :

- Change requests to registration.
- When a Web Report submitted by the user fails Validation.
- When a Web Report is successfully sent to FIU-ICE for approval.

It should be noted that when a Web Report is formally accepted or rejected by FIU-ICE no email is sent to the user who submitted the Web Report. When this is done a message is sent to the MB of the relevant organization to acknowledge the status of the Web Report.

If the Web Report was rejected a reason is provided in the message.

When registration of a new organization is finished please send an email to pt@hersak.is to notify FIU-ICE of a pending registration.

The request will be reviewed by FIU-ICE and an email will be sent to the registered email address when the review process is complete.

Registstration of a Person

This is exactly the same as covered under the [registration of an organization](#).

To be able to register as a Person it is necessary to know the *Organization ID* of your organisation in goAML.

The **Administrator** of that organization can provide this ID.

The goAML Web Interface

Above the full goAML Web interface can be seen, it changes depending on the rights of the user logged in.

New Reports

The creation of new reports by :

- **XML upload** – Attach file and upload.
- **Web Reports** – To start filling out the Web form for manual reporting.
- **XML Report Validator** – To test XML files. FIU-ICE can also provide a separate application for these purposes.

Drafted Reports

Access to reports that have not been sent to FIU-ICE but saved as drafts:

- **Current Report** – The last report that was saved.
- **Not Submitted Web Reports** – A list is presented and a saved report can be opended and edited. Reports are saved for 14 **days** but after that time they are deleted for security reasons.

Status	Last Updated On	Days before Cleanup	#
Not submitted	31/03/2020		✏️ ❌ 👁️
Reverted - Not submitted	30/03/2020		✏️ 👁️
Not submitted	30/03/2020		✏️ ❌ 👁️

By selecting the pencil icon the report is opened for editing

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Submitted Reports

Access to reports that have been sent to FIU-ICE either in XML format or manual reporting.

A list is presented and the the far right section is most important.

Here the status of the current report can be seen and reports can be viewed and saved in XML format.

All accepted reports have the status of *Processed*.

If the report status is *blue* it needs attention and it is possible to select the status to get more detailed information.

Other main statuses are :

Failed Validation – Some required elements are missing from the report.

A report with this status is classified as submitted and it can be seen under Submitted Reports however the submission process failed and the report has not been sent to FIU-ICE.

The user who submitted the report should receive an email notification with a description of the error when a report fails Validation.

Reports with this status are saved for **14 days** but after that time they are deleted for security reasons.

The most common reasons for failed Validation are :

1. Missing information in *Reporting Entity Reference[1]* field on the *Report Cover*.

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[1] **Error Message** - *Error #: 1 Location: Line 6, Position 4 Description: The element 'report' has invalid child element 'submission_date'. List of possible elements expected: 'entity_reference'.*

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2. *Institution Name*[2] is not provided when registering an Account for My Client in a transaction.

By clicking on the status *Failed Validation* further technical information regarding the reason for this status can be seen. If the error is unclear then this error message should be sent to FIU-ICE for review so that FIU-ICE can advise on the next steps, the Message Board should be used to do so.

To retrieve the report for editing it is selected to *revert* the report. The status of the report is changed to *Reverted* and the deletion timer is reset.

The report can then be accessed under the *Drafted Reports* section of goAML Web and submitted again after review.

Validated; Scheduled for loading – The report has passed automatic validation regarding structure etc. and is in the process of being sent to FIU-ICE. The user who submitted the report should receive an email to acknowledge this.

Rejected – The report has been rejected, by clicking on the status a message from FIU-ICE is shown regarding the reason for the rejection. It is possible to *revert* a report that has been rejected so that it can be reviewed and submitted again. The report is accessed from the *Drafted Reports* section. A message is also received on the Message Board from FIU-ICE when a report is rejected.

Reverted – The report has been reverted by a user to be edtited or deleted. This is a permanent status since a report will receive a new Report ID when submitted again. If report no. 219-0-0 was reverted and submitted again it would receive the no. 219-0-1.

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[2] **Error Message** - *Error #: 1 Location: Line 29, Position 10*
Description: The element 'from_account' has invalid child element 'institution_code'. List of possible elements expected: 'institution_name'.

When reports are not accepted for whatever reason a user can click on the status (if it is in blue) of the report and revert the report to that it is sent back to *Drafted Reports* where it can be reviewed and edited.

Transferred from Web – The report has been sent to FIU-ICE and is waiting for review.

It is possible to preview and print the report or download it in XML format in the selection on the far right. It is possible to do so for 14 **days** after a report was submitted but after that time the content of the report is deleted for security reasons.

Message Board

The Message Board is where communication with FIU-ICE takes place regarding issues with goAML, individual reports and data requests.

Reporting entites and stakeholders cannot communicate with each other.

All users with access to the Message Board within an organization can see all messages and this form of communication is between reporting entity/stakeholder and FIU-ICE, not person to person.

When a message is received on the Message Board a notification email is sent to the email address that was registered with the organization. The content of the message on the Message Board is however not revealed for security purposes.

An autogenerated message is sent to the Message Board from FIU-ICE regarding all reports that are either accepted or rejected. If the report was rejected a short message will detail the reason for the rejection and it can be reverted by a user to be edited and submitted again.

Data requests by FIU-ICE are sent to reporting entities on the Message Board and replies are also received on the Message Board if the reporting entity is unable to send a reply with the report type of AIF (*Additional Information File*) or ATL (*Addittional Transaction List*) in XML format.
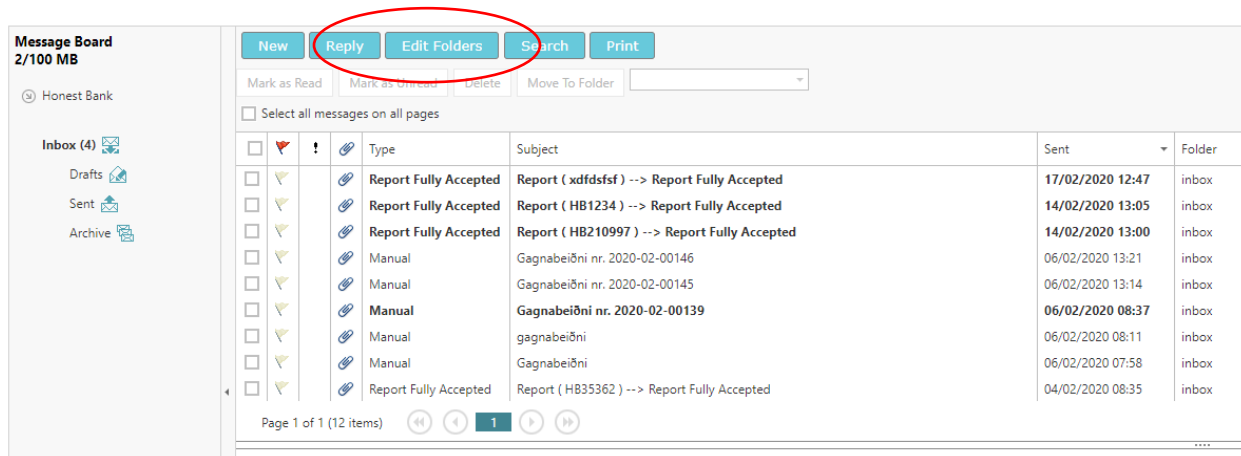
The interface of the Message Board can be seen above.

It is very similar to online email and easy to navigate.

It is possible to create folders to sort messages and to delete them manually.

Messages are automatically deleted after **30 days** for security reasons.

Prior to that time the messages can be printed out and attachments (such as data requests from FIU-ICE) saved.

The interface for a new message can be seen on the next page.

Further information on individual fields

Type – This is the type of the message to be sent, selected from a drop-down list

- Data Request - Answer to a Data Request from FIU-ICE.
- goAML Issues – For problems with goAML Web related to reporting or rejected reports.
- Manual - All other messages.

Ref. Num. – This should be :

1. The number of the *Data Request* from FIU-ICE that is being answered.

2. The number of the report which is the reason for the message. This can be either a reference number provided by FIU-ICE, such as a *Report ID*, or an *internal reference number* of a reporting entity.

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It is very important to fill in this field so that FIU-ICE can see clearly the purpose of the message and the relation of the message to reports or other messages.

When selecting files to upload it is possible to select several files at once.

The rest of the fields are self-explanatory.

My goAML
Access to information regarding the registration information of an organization, User and to change password. If changes are made to the registration information of an organization or user a request has to be submitted by pressing the button at the bottom of the page.

User requests are sent to the administrator of the organization who can access it under the *Admin/User Request Management* section of the interface.

Organization change requests are sent to FIU-ICE to be finalized, it is possible to recall these requests at any given time from this menu before FIU-ICE reviews them.

Statistics
They can be accessed in various predetermined ways. The statistics can be displayed either in *Chart* form or as a *Pivot* table. The selection can be seen below. The filter function is to determine the time period to be displayed.
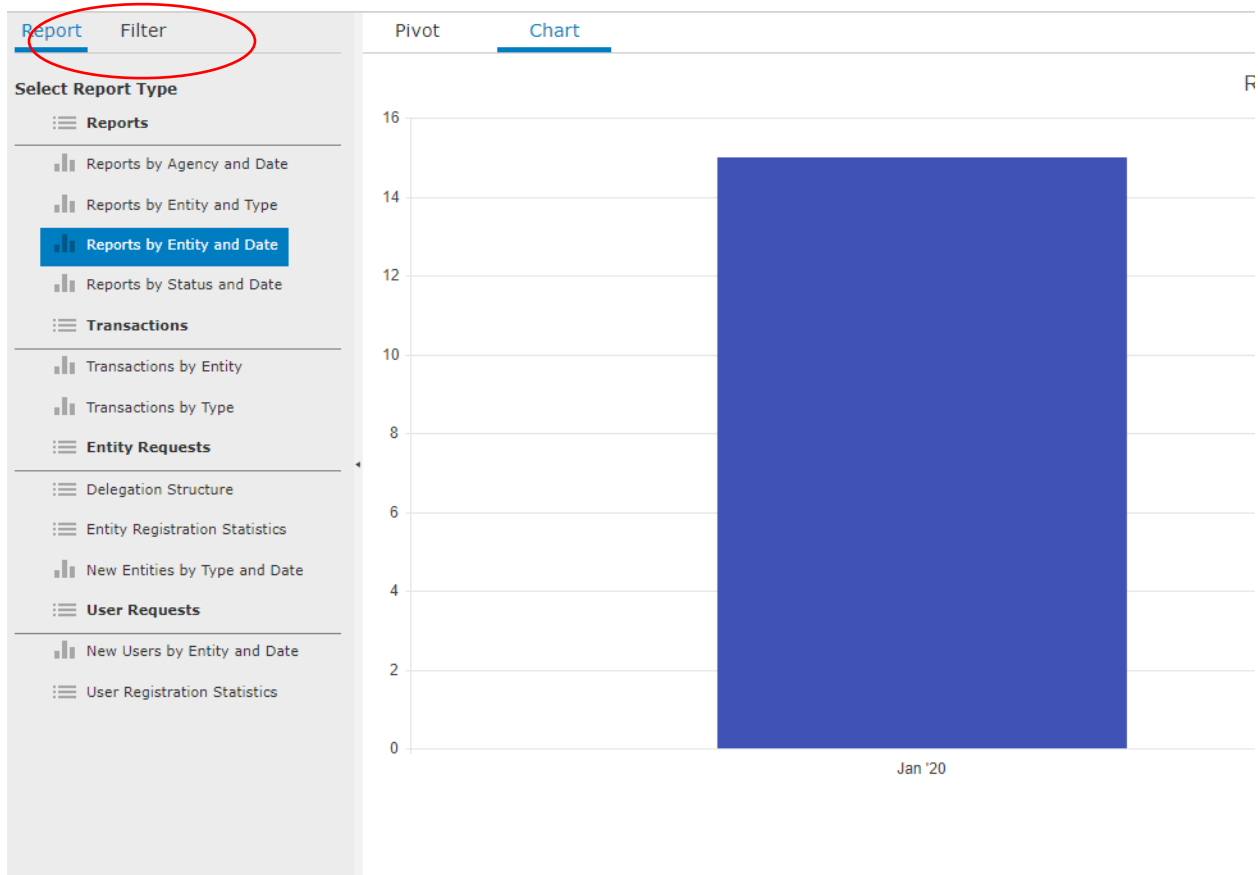
Cleanup of data

Due to the sensitive nature of the information found in reports and messages on the goAML Web server they are automatically deleted after a certain time period.

For submitted/drafted reports this time period is **14 days**.

For Messages on the Message Board this time period is 3**0 days**.

It is possible to print out or save the information manually at any time prior to deletion.

Basic information regarding all reports sent to FIU-ICE will always be available, f.x in relation to statistics, but the specific content of each reports has been deleted.

No deletion warnings will be sent before the automatic deletion process so this needs to be monitored by an Administrator of a reporting entity.

The Administrator Role

An Administrator will have more access then the standard user and will manage other users of that particular organization. An *Admin* and *Statistics* section of the goAML web interface will be available to an Administrator and not the standard user.

The Administrator has right to :

- **Access statistics**

- **Users**
  - Review and accept new users.
  - Review and accept change requests made by users.
  - Ability to reset passwords.
  - Can give/create roles and give more access to some users.
    - F.x to give access to statistics.

- **Organization**
  - Can make changes to registration.

- **Access the Admin menu :**
  - Role Management
  - User-Role Management
  - User Request Management
  - Active Users
  - Org Request Management
  - Active Organization

Each section of the Admin menu will be covered in more detail in this chapter.

The Role Management interface is shown on the next page, with the exception that some of the options for Person Change Requests are not visible but that is covered under *Person Change Requests*.

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Role Management

Roles are a way of giving a group of user certain rights or access in goAML Web.

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So instead of having to manage individual user rights, user roles are assigned. So it is easier to manage users and in particular new users.

The roles are divided in two :

Universal Roles are default roles created by FIU-ICE and all users are either an admin or user. By clicking on the roles the difference in rights is shown.

The Roles available for : Specific roles created by an administrator of an organization and only available to that particular organization.

Depending on the rights given to a user the Web interface changes.

The categories within Role Management are :

Reports
This controls what the user can do regarding the submission and viewing of reports.

My goAML
This controls what the user can see regarding himself, the organization, access to the Message Board and the ability to log in as a delegate.

The delegate feature is needed to report on behalf of more then one reporting entity. This could come into consideration if two reporting entites are connected. The delegate feature is covered in more depth under the section of *Active Organization*.

Statistics
Here all manner of statistics are made available.

Admin
This controls the basic management of other users.

Entity Change Requests
This controls the ability to make changes to the registration information of the organization.

Person Change Requests

This controls the ability to *approve/verify/finalize/reject* changes requests made by users of that organization.
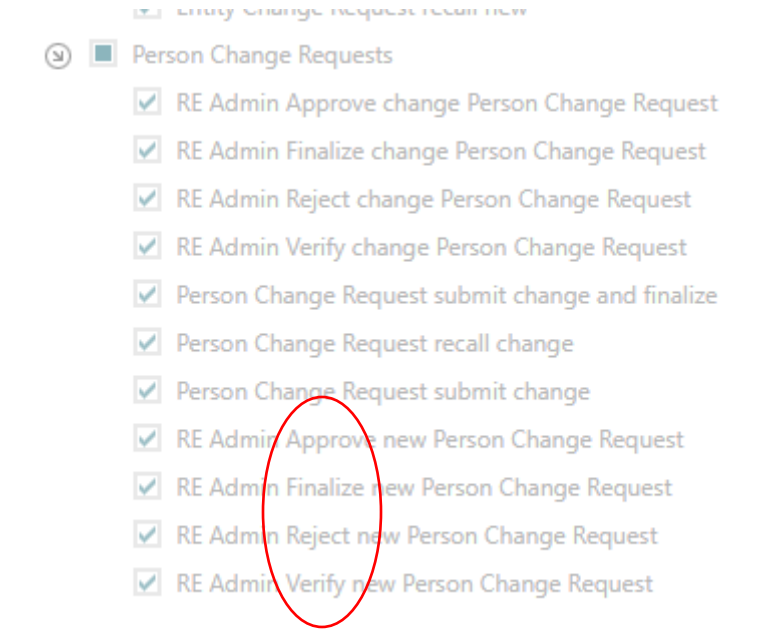
Here it is possible to give other users the right to *approve/verify/reject/finalize* new users of that organization. The difference between *approve/verify/reject/finalize is* covered under *User Request Management*.

User-Role Management

This is an overview of users within an organization and the roles assigned to them. On the far right the particular rights of the selected user can be seen.
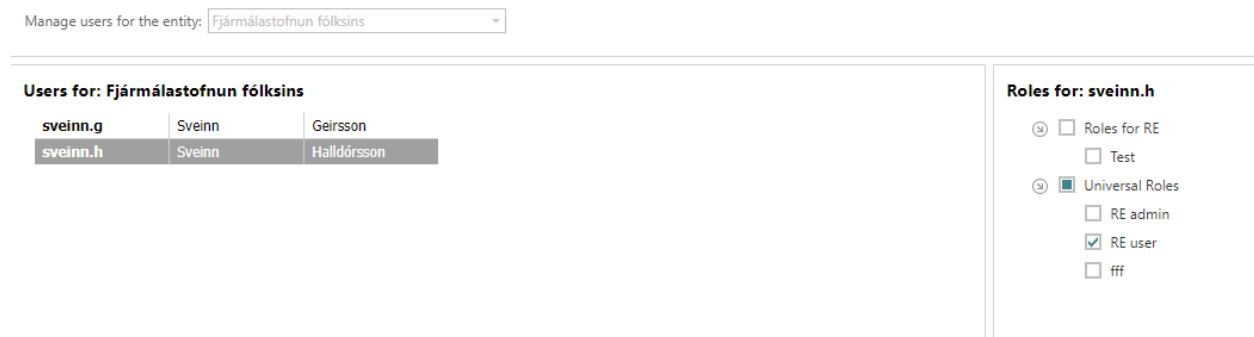
User Request Management

Requests made by users are reviewed here. These are changes in the details of users and <u>most importantly the review of a new user for rejection or acceptance which is the responsibility of the Administrator of that organization</u>.

Below a pending request of a new user within an organization is displayed

By clicking on the *Request Status* the request is opened and can be viewed below

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Reviewing a new user gives the option to : *Reject, Verify, Approve* and *Finalize* (the rights to access these options are set under *Person Change Requests*.

In larger organizations there could be a need for more persons involved in the process of accepting new users. The option to *Verify* gives the possibilty to divide this process between another user and the administrator.

When a user has been *Verified* could f.x indicate to the administrator that he should start his part of the process which would end with *Rejection* or *Finalization* of the request. This could also indicate that the user has been vetted or approved by a superior and then the role of the administrator is only to formally *Finalize* the request to give access.

The *Approve* option is different because then the registration is sent to FIU-ICE to be *Finalized*. The management of new and current users is the responsibility of administrators with reporting entities and stakeholders so requests in general should not be referred to FIU-ICE this way.

The Administrator must monitor requests made and is responsible to *Finalize* these requests to create new users for that organization.

No notifications are sent to the Administrator with email when new users apply for access so this has to be monitored.

When a request is *Verified/Approved/Finalized* it is possible to insert a comment at the same time which will inserted in the request and viewable to others handling the request.

Active Users

A list of the active users of an organization.

On the far right several options are available to make changes like to disable a user and to reset password. By resetting a password an email is sent to the registered email address of the user with further instructions

Org Request Management

The same as *User Request Management* but for the organization.

This is only for viewing, all changes need to be made by FIU-ICE and requests to do so should be made with the Message Board.

Active Organizations

Details about the organization associated with a particular is viewable and this is also where delegates are selected or created. The organization ID is displayed in this menu, it is necessary for new users to know this ID number in order for them to be able to register as part of that organization.

Delegates are used when it is necessary to report on behalf another organization.

This could be f.x on behalf of a subsidiary or if a supervisory entity reports on behalf of many organizations.

The ability to be able to log in as a delegate can be set by an administrator under the *MygoAML* menu, it is on by default.

The delegating rights are given to an organization and then it depends on the number of users within that organization who have the right to log in as delegates who of them can report on behalf of the delegating organization.

Delegation is the subject of review by FIU-ICE and requests for delegation can only be finalized by FIU-ICE.

Create New Delegating Organization
This process allows for the creation of a new organization that has not been registered in goAML, the standard registration window for an organization appears where registration is completed.

The delegated organization will then appear under *Active Organizations* when it has been reviewed and accepted by FIU-ICE.

If a delegate is available to a user the login screen changes :

When logging in the user will need to select a reporting entity for the login session from a drop-down menu.

Change Selected Delegating Organization

If there is a delegate available it will be presented in a drop-down menu

If it is selected to *Change Selected Delagating Organization* the following registration window appears.

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Here the unique ID of the organization Bókhald and Verk (5) can be seen along with the unique ID of the *Delgate Organization* Fjármálastofnun fólksins (4). This means that the particular user is part of organization no. 4 but can also make reports on behalf of organization no. 5. This is because an delegation connection already exits between the organizations.

Sever delegation connection

The delgation connection is severed by selecting *Change Delegation Organization ID* in the top left corner. The greyed out fields then become editable and the field *Delegate Organization ID* should be changed so that it is left blank.

Press *Submit Request* at the bottom and FIU-ICE will review it.

It should be noted that if an organization was created by another organization by using the option to Create New Delegating Organization then no user is associated with that organization after the delegation connection has been severed. It is therefore necessary to register a new user (in this case a Person with the Organization ID of 5) for that particular organization to be able to report to FIU-ICE.

Create a delegation connection with an existing reporting entity

This is basicly the reverse of severing the delegation connection.

First it must be selected to *Change Delegation Organization ID.*

By doing so makes the *Delegate Organization ID* editable and the unique organization ID of the reporting entity to receive the delegation authority is inserted.

Press Submit Request at the bottom and FIU-ICE will review it.

The request can be seen under *Org Request Management* in the aministrator menu and there is an option to cancel it before FIU-ICE has reviewed it.

The request is also visible to the reporting entity to receive the delegation authority.

By delegating this authority to another organization does not mean that the organization that did so cannot also report directly to FIU-ICE. It just means that premission has been given to another organization to so as well.

The User Role

The default standard user will be able to send reports, view them on the web, log in as a delegate and communicate with FIU-ICE on the *Message Board*.

If it is necessary to give more rights to certain users then new roles must be created by the administrator.

Transactions

There are a few key items that will be covered in this section of the guide that define a transaction and is necessary to explain before going into more detail.

It is possible to upload an XML file ⬆ with transactions instead of manual input. This way an XML only needs to be generated for the transactions and the rest of the report is manually input.

Because the XML file needs to contain only transactions the structure is different compared to standard XML reporting and should be in the following format :

```
<reportdata>

        <transactions>

                <transaction>

                …

                </transaction>

                <transaction>

                …

                </transaction>

        </transactions>

</reportdata>
```

Therefore it is not possible to upload transactions from an STR XML report since this contains additional information not expected in a transaction upload.

It is possible to have both manually input transactions and uploaded XML transactions in the same report and this can be a convenient way to add atypical transactions that is not possible to generate in XML for example but need to be reported as well.

BiParty vs. Multiparty
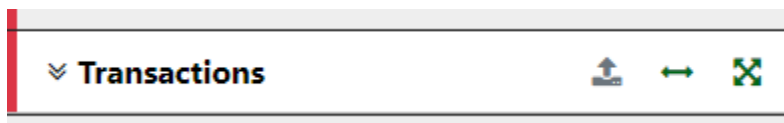
Is the transaction *BiParty* ↔ or *MultiParty* ⤨ ?

The vast majority of reported transaction is *BiParty*, that is the transaction has a direction and two parties, a *From* (sender) and *To* (recipient).

However some transactions do not fit this pattern, for various reasons, which would make them *MultiParty* or a directionless transaction than can have multiple parties.

MultiParty transactions should not be used without the prior consent of FIU-ICE.

The use of *Multiparty* transaction should only be considered for :

1. Transactions that did not actually take place or were attempted.
2. Non financial institutions - Where the reporting entity is part of the transaction that is being reported[3].

Information in a *Multiparty* transaction is constructed without a clear direction of funds transfer and based on the context of different parties in relation to the reported transaction.

Because a *Multiparty* transactions is constructed in such a way it is ideal to describe transactions that did not take place but need to be reported.

Examples of this is a loan application, currency exchange or attempted CEO fraud that was denied/halted. In all cases a certain attempted transaction (payout of loan, exchange of funds or electronic transfer) is known and is the whole reason for reporting.

The selection that is presented in the web form when registering the transaction is different depending on the transaction type of *BiParty* or *MultiParty*. How to register these different transaction types is covered in the sections *BiParty Transaction* and *MultiParty Transaction*.

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[3] The reporting entity is either the sender or recipient of the funds being reported, f.x when a transaction is being reported due to the EUR 10.000 limit

My Client vs Not My Client

Once it has been decided if the transaction is *BiParty* or *MultiParty* it needs to be decided if the Parties are a Client of the reporting entity or not.

The difference lies in the amount of mandatory information which is higher for *My Client* and <u>at least one of the reported Party Types should be *My Client* for all reported transactions</u>.

If the reported transaction originates or ends with a client of the reporting entity then it should be registered as *My Client*.

<u>FIU-ICE can make an exception from this in very specific circumstances and allow Not My Client on both sides of the transaction (see</u> Business Rules<u>)</u>.

The Party Type can be a *Person*, *Account* or *Entity* depending on the transaction. The most common transaction would be a type of an electronic transfer from *Account* to *Account*.

Funds Code

This is defined for each party of the transaction and describes the form of the funds in relation to that particular party. It is also possible to think about this as the physical form of the funds with this party of the transaction (See Funds Code in the appendix for more detailed information)

Example

A BiParty transaction example could be that a person decided to transfer money from his bank account to the bank account of another person. Then the *Funds Code* for both the recipient and sender would be *Account* since that is the form of the funds with both parties (at the start and at the end of the transaction). An *Account* is very broad concept and when registering an *Account* it is mandatory select an *Account Type* to further indicate the funds in question.

If the Transaction is in foreign currency it is also required to input the amount in the *Foreign Currency tab*.

This only needs to be done on either the *From* or *To* side of the transaction but not both sides. This depends on the nature of the transaction itself.

A currency exchange from ISK to EUR would for example have this input on the *To* side of the transaction.

Transmode Code

This is the specific way funds or goods are transferred and is determined on the *Transaction Cover* once for each transaction, this is selected from a predetermined drop-down list. (See Transmode Code in the appendix for more detailed information)

If it is not possible to register a suspicious transaction from this selection then it is probably necessary register more transactions in the report to illustrate this.

Example

Person A deposits cash to his current account and then transfers the funds to the current account of person B, this would be two seperate transactions.

The first transaction details the deposit of cash by A to his own current account, so A is the sender of the funds and his current account is the recipient of funds (With person A as the signatory for the bank account).

The second transaction would be a type of electronic transfer from the current account of A to the current account of B. Both A and B could be *My Client* depending on if the bank accounts are both with the same reporting entity or not.

Report Types

All reports are either transaction or activity based.

There are several report types available and each report has a specific purpose.

The use of XML reporting is not permitted without prior validation and approval of FIU-ICE.

AIF – Additional Information File
When FIU-ICE sends a request for additional information about a Person, Entity or Account to a reporting entity with the *Message Board* it is possible for the reporting entity to reply to the request by sending in a report of this type instead of replying to the message with attachments. This would be the most common use for this report type.

This is an activity based report so there is no information on transactions. This shares the same basic specification as a SAR with has few mandatory fields to allow flexibility for reporting. It is however expected by FIU-ICE that available information is registered regarding a client of the reporting entity.

This kind of reporting is only available to reporting entities that have XML reporting capabilities. If such capabilities are not available the request for information should be answered using the *Message Board*.

The no. of the request from FIU-ICE (*ORD-XXXXX*) **must** be input in the *FIU Reference* field when filing a report of this type as an answer to a data request.

It is not necessary to input anything in the *Reason* field for this report type.

The My Client specification should be applied depending on if the Report Party is a Person, Entity or Account.

The subject of the request from FIU-ICE should be registered as the Report Party.

It is mandatory to register an *Indicator* and the type *Other* (Code -) should be used.

AIF without a prior request from FIU-ICE

If such a report is sent without a prior request from FIU-ICE , such as some additonal information in relation to a STR, then the *FIU reference field* should be left blank.

Instead the *Reporting Entity reference* field should be filled out with the same reference no. from the reporting entity as the related STR.

FIU-ICE can use this to match the reports.

ATL – Additional Transaction List

When FIU-ICE sends a request for information regarding transactions, this would mainly be bank statements, to a reporting entity with the Message Board it is possible for the reporting entity to reply to the request by sending in a report of this type instead of replying to the message with attachments. This would be the most common use for this report type.

This is a transaction based report and shares the same basic specification as an STR with regard to reporting.

For reporting entites that have XML reporting capabilities it is requested that all STRs/SARs are accompanied by a seperate ATL with the bank statements of the reported person for the last 12 months.

This kind of reporting is only available to reporting entities that have XML reporting capabilities. If such capabilities are not available the request for information should be answered using the *Message Board*.

The no. of the request from FIU-ICE (*ORD-XXXXX*) **must** be input in the *FIU Reference* field when filing a report of this type as an answer to a data request.

It is not necessary to input anything in the Reason field for this report type.

It is mandatory to register a *Indicator* and the type *Other* (Code -) should be used.

ATL without a prior request from FIU-ICE

If such a report is sent without a prior request from FIU-ICE , such as some additonal information in relation to a STR, then the *FIU reference field* should be left blank.

Instead the *Reporting Entity reference* field should be filled out with the same reference no. from the reporting entity as the related STR

FIU-ICE can use this to match the reports.

CTR – Cash Threshold Report / Cash Transaction Report

These reports contain a list of transactions over a certain period where a selected amount or threshold is exceeded for cash transactions.

The threshold for reporting is decided by the reporting entity.

This is a transaction based report and shares the same specification as an STR with regard to reporting with the exception that in a CTR it is only possible to report BiParty transactions.

This kind of reporting should only be used by reporting entities that have XML reporting capabilities.

It is not necessary to input anything in the Reason field for this report type.

It is mandatory to register a *Indicator* and the type *Other* (Code -) should be used.

SAR – Suspicious Activity Report

This is an activity based report and due to the nature of SAR´s the mandatory fields are few but it is expected that as much information as is available is registered.

It is necessary to fill in the Reason field for this report type.

This is enforced by a Business Rule.

STR - Suspicious Transaction Report

This is the most common kind of report.

The report type of STR is transaction based and also used to illustrate the filing of a transaction based report which starts on the next page.

It is necessary to fill in the Reason field for this report type.

This is enforced by a Business Rule.

TFR – Terrorist Financing Report

This is a transaction based report and shares the same specification as an STR with regard to reporting.

A TFR report will receive the highest priority for analysis by FIU-ICE.

It is necessary to fill in the Reason field for this report type.

This is enforced by a Business Rule.

Filing a transaction based report

Reports are either Activity based or Transaction based.

By selecting *New Reports* and *Web Report*, in the top left corner of the goAML Web interface, it is possible to register a *New Report.*

A drop down menu appears and the most common type of a report is a STR and this report type will be used in demonstrating how to fill out the web form and submit it to FIU-ICE.

Report Cover

It should be noted that all fields marked with red or * in the web form are mandatory.
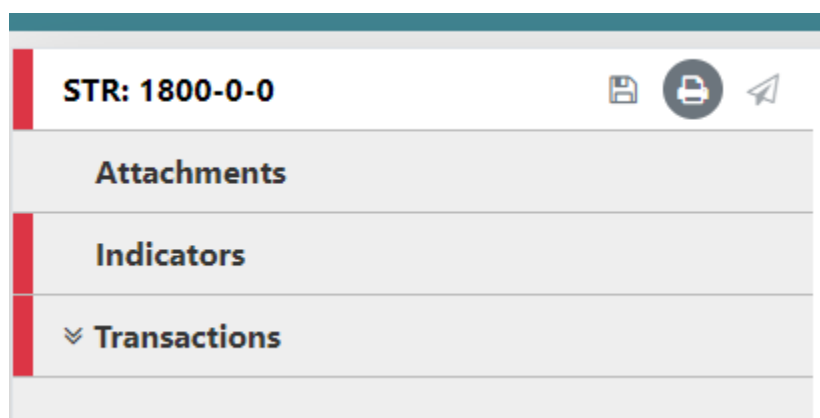
When registering a report a menu is always present on the left side of the screen, in the top row next to the number of the report it is possible to *Save Report, Preview or Submit Report*.

Preview becomes accessible after a report has been saved and shows the report in a structured format.

It is recommended to save the report regularly since users will be automatically disconnected for security reasons if they remain inactive for a certain period.

All the relevant tabs of the report are marked in either **red** or **green** which indicates if the necessary information has been input.

Only when all tabs have been marked in **green** it is possible to send the report, until that time the submission icon is greyed out.

Selecting each of the tabs opens the corresponding menu for the report.

Action

* Reference Date

21/03/2022 📅

Reporting Person

Further information on individual fields

Reason – Here a detailed description of the events being reported is documented.

Action - If any specific action was taken in regard to the report then please specify here. Examples could be that an account was closed or that a business relationship was terminated.

Reporting Entity Reference – A unique identifier for the reporting entity which can be used in communication with FIU-ICE.

This field can be used instead of the FIU Reference field when there is no data request being answered from FIU-ICE or when a STR and ATL are sent at the same time and therefore the Report ID of the STR is not readily available.

Reference Date – The submission date of the report.

Location

Selecting the + icon a window opens were it is possible to register the location related to the transaction or activity being reported. Geo coordinates can also be provided if relevant.

✛ Location				🗑
* Type is required!	* Address is required!	* City is required!	Zip	
▾				
* Country is required!				
▾				

✛ Geo Location				🗑
☐ Is Approx Location	Error Distance Margin	Margin Uom	* Latitude is required! ◉	
* Longitude is required! ◉	Plus Code ○			

Additonal Information

It is possible to register additonal information that is not thought to be relevant under the Reason or Action fields.

Attachments

It is possible to add attachments to the report.

Pressing the + in the top right corner opens a menu to add attachments.

It is possible to drag and drop attachments or to open a menu to select attachments, multiple items can be selected using either way.

Indicators

Selecting the + icon a window opens were indicators can be selected to indicate the suspected criminality.

Several can be chosen but it is only mandatory to select one indicator.
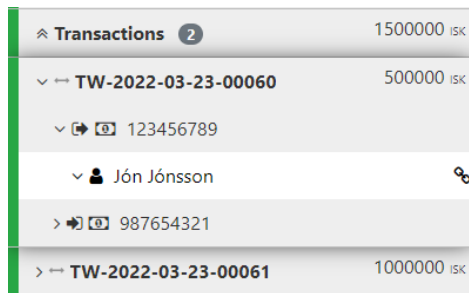
Transaction Cover

All information related to the transaction being reported is input here.

Before a transaction can be registered it needs to be decided if the transaction is BiParty or MultiParty and then if the parties in question are a client (My Client) of the reporting entity or not. The difference between *BiParty* or *MultiParty* on one hand and *My Client* or *Not My Client* has already been covered.

Once BiParty or MultiParty has been selected the screen displays the transaction cover page.

From the Transactions tab each transaction can be opened/collapsed to show separate parts of the registration and also to allow direct access to different parts of the transaction

At any given time by pressing the *Transactions* tab on the left side toolbar a list is presented for all the transactions that have been registered for this report as can be seen below.

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Here it is possible to edit or delete a particular transaction or to register a new transaction by selecting BiParty ⟷ or MultiParty ✖ in the top right corner. It is also possible to download or upload [⬆] [⬇] transactions in XML format.

In this version of goAML Web the top right corner always gives the option to delete [🗑] the entire record that is open.

When applicable it is also possible to use an existing record ♻ of a Person, an Account or an Entity that was registered earlier in the report.
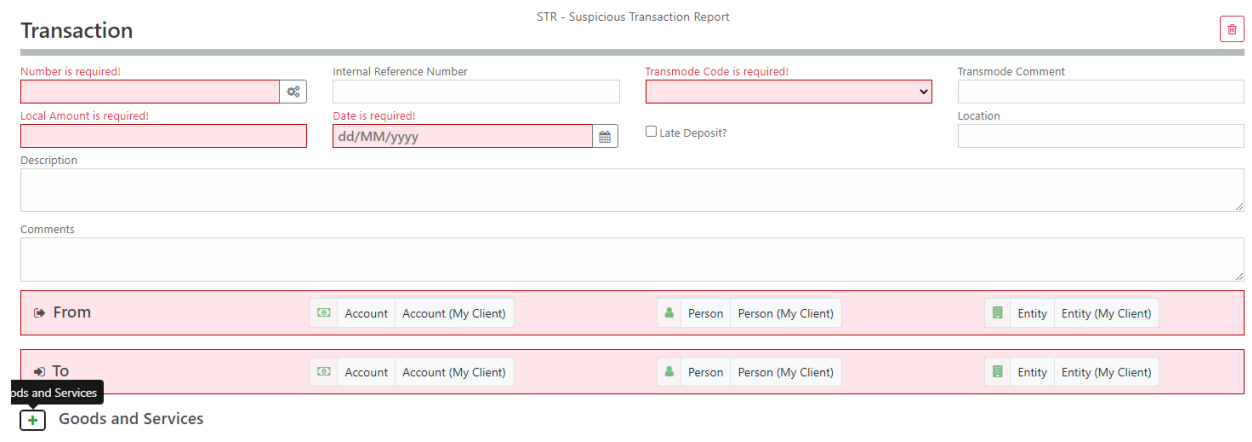
When an existing record is used in this manner a link is displayed [🔗 2] in the top right corner of the menu and the numeric value indicates how often that particular registration has been used in the report.

A report can have multiple transactions.

The registration of additional transactions can be done in two ways :

1. Transactions tab - Select the BiParty icon to open a new registration window.
2. Transactions table – When viewing the *Transactions* table select the BiParty icon in the top right corner to open a new registration window.

From the *Transactions* tab/table it is also possible to access registered transactions to edit them.

Further information on individual fields

Number – This is a unique number of the transaction, it is possible to generate this number by pressing the cogs to the right of the field if it is not possible to supply this information.

If this number is supplied by a reporting entity it should be the same and recognized by the reporting entity which is the counterparty in the transaction for deduplication purposes.

A bank transaction can be reported from both the *From* and *To* part of a transaction and it is necessary to identify this transaction as the same one if it were to be reported by both reporting entities.

Internal Reference Number – This field can be used by a Reporting Entity to label the transaction to f.x. an internal numbering system unrelated to goAML.

Transmode Code – What kind of kind of transaction is being reported, selected from a drop-down list

Transmode Comment – the *Reason* field on the *Report Cover* should be used for most of freetext information but it is also possible to input more detailed information which is specific to this kind of transaction. This could f.x. be used to categorize transactions (Icelandic - bunkanúmer) by a reporting entity.

Local Amount – All reported transactions are to be reported in **Icelandic Krona**.

Date – The date of the transaction

Location – The location of the transaction. This is unique to each transaction and differs from the *Location* and *Branch* fields, which can be visible, on the *Report Cover* since they are the same for the entire report.

This field is mandatory for reporting entity types of Commercial and Savings Banks for ATM/Branch transactions and is enforced by a Business Rule.

Description – This field is not mandatory but could be very useful and informative if more data is available regarding a particular transaction. This could be f.x. an explanation that was provided for the transaction or some text description that is available to a reporting entity regarding the transaction.

Comments – the *Reason* field on the *Report Cover* should be used for most of freetext information but it is also possible to input more information related to the transaction depending on information available to a reporting entity. This is something that could f.x. be considered if many transactions are being reported (with same *Transmode Code*) and but they are not all alike.

Goods and Services

If the transaction is related to any type of goods and services then details of that are input here. This applies when the purchase or sale of high value items is being reported such as vehicles and jewelery.

The registration of these items is very open for input since items in question can be very different.

FIU-ICE requests that all available information about the item is registered.

Means of Transport

Related to Trade Based Money Laundering (TBML) it is possible to register information about transportation. Currently this tab has not been configured by FIU-ICE.

Once details about the transaction itself has been entered the next step is to enter information on the *From* and *To* side of the transaction

BiParty is the preferred way of reporting by FIU-ICE and will be covered next in more detail.

BiParty Transaction

This is a *From* and *To* transaction. The *From* side indicates where the funds are at the beginning of the transaction and the *To* side indicates where the funds are at the end of the transaction.

The *From* and *To* side of the transaction are entered separately and it needs to be decided which side (or both) are related to a client of the reporting entity.

The difference between *My Client* or *Not My Client* has already been covered.

From or To, selecting to register a Person, an Account or an Entity

When selecting to register the *From* or *To* party of the transaction it is necessary to choose to register a party type which can be a Person, Account or Entity.

When considering this it is most important to think about the selected *Funds Code*.

In general the vast majority of reported transactions is between two *Accounts* and should be registered accordingly. This especially applies to banks and other financial institutions and of course if the reporting entity has the necessary information available.

Once an Account, Person or Entity is selected the below selection appears where it is necessary to register the *Funds Code* and *Country* of the transaction before entering details about that particular Account, Person or Entity and this menu is the same regardless of the party type selected.

Further information on individual fields

Funds Code – The form of the funds, more details are in the appendix.

Country – The location of the *From* or *To* side at the time of transaction, the most common example of a different country then Iceland would be if a foreign bank account is being reported.

The registration of a Person, Account or Entity within a transaction can be viewed in the corresponding section of this guide, much of it is the same but there are some differences.

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MultiParty Transaction

When *MultiParty* is selected the interface changes and the *Involved Parties* selection replaces the *From and To* transaction description fields since a *MultiParty* transaction is directionless.

In these transactions information about a *Person* or *Entity* is considered most important and also the most accessible to most of the reporting entites that will use *MultiParty* transactions .The main reason being that in many cases the necessary information to register the transaction in the preferred way of *BiParty* (Account to Account) is simply not available to the reporting entity.

In most cases a *Person* or *Entity* is registered as My Client for these kinds of transactions.

BiParty transactions that would include a non financial reporting entity as either the *From* or *To* party should not be reported that way, such reported transactions should be registered as *MultiParty* even if that means that only one *Person* or *Entity* is reported in the transaction

For example A buys jewellery from a reporting entity. In a standard BiParty transaction the reporting entity would need to report themselves as part of the transaction.

By registering this as a *MultiParty* transaction the reporting entity can register only the buyer[4] and optionally the jewellery under *Goods and Services*.

Multiparty transaction are only to be considered for non-banking transactions or to describe transactions that did not actually take place.

Because a MultiParty transaction is without direction it is ideal to describe a transaction that did not take place but needs to be reported.

Examples of this is a loan application, currency exchange or attempted CEO fraud that was denied/halted. In all cases a certain attempted transaction (payout of loan, exhchange of funds or electronic transfer) is known and is the whole reason for reporting.

Since there is no direction of funds in the definition of a MultiParty transaction it is necessary to specify the role of each registered party type selected.

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[4] Even though this is named MultiParty it is possble to register only one Person/Entity/Account in a transaction.

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Foreign Currency tab

If the transaction is related to foreign currency in any way it needs to be input here.

This applies if the *Transmode Code* of a reported transaction is a type of *Currency Exchange*. Then this should be registered under either the *From* or *To* side of the transaction depending on if the foreign currency was being bought or sold. This would also apply if funds are being reiceived/sent from/to another country.

Selecting to register a Person, an Account or an Entity

When it has been decided if the Involved Party is a client of the reporting entity or not it is necessary to choose to register a *Party Type* which can be a *Person,* an *Account* or an *Entity* which is covered under the relevant topic in this guide.

Party Type - Person

The mandatory fields are different depending on if the Person (My Client) is a client of the reporting entity or not. In general this is the case for at least one side of the transaction.

Person (My Client)

The fields marked in **red** or with an ***** are mandatory.

At least one of the fields circled in **green** also needs to be registered, this is enforced by a Business Rule. If information is available about SSN and Identification then it is requested that both are registered.

The field *SSN* is for Icelandic SSN (Icelandic - Kennitala) only and should always be registered for Persons if available.

All forms of ID or unique identifiers, such as Foreign SSN, should be registered under the *Identification* tab

Most of the other fields are self-explanatory.

There are a number of tabs that can be opened by clicking the + to expose the relevant fields.

When registering an Account, Person or Entity it is always possible to select the *Use an existing Person/Account/Entity* ♻ in the top right corner. This is helpful when registering multiple transactions between the same *Person/Account/Entity.*

However this is only connected to the specific report being filled out and is reset once the report has been submitted to FIU-ICE

Further information on individual fields and mandatory tabs

Is Suspected – It is possible to indicate if only the From or To part of the transaction is considered suspicious.

Phones

The *Phone* registration covers more then just phones and is used for communication in general.

Contact Type – Is this personal or related to business/work?
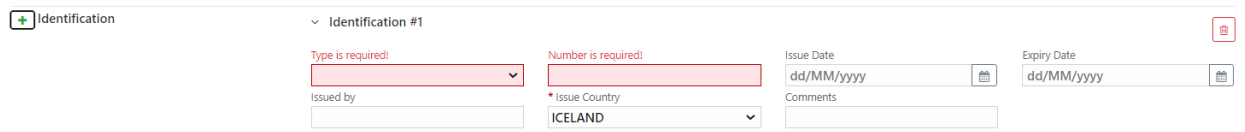
Comm. Type – The communication method/device.

Number – This can also be used to register IP addressess, f.x. in relation to Internet banking.

Addresses

In general this would be the legal registered address of a person or entity.

Identification

It is necessary to register an ID if an Icelandic SSN is not available.

Any other information that is available about the ID is appreciated.

To register an ID it is mandatory to input the *Type*, *Number* and *Issue Country*.

When everything has been registered press *Save* on the Report menu on the left of the screen.
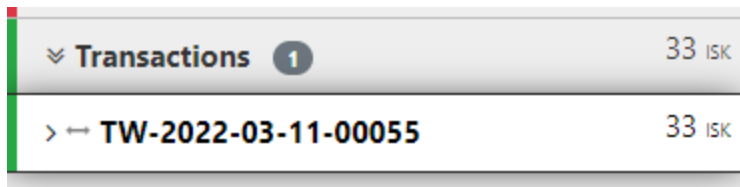
The transaction will be represented with a green line on the left to indicate that everything necessary has been registered in that particular transaction. Both the From and To side of the transaction need to be registered for this to be green.

The arrows next to the *Transactions* tab open or close the details of the transactions that have been registered.

Selecting the *Transactions* tab gives the option to register more transactions and changes the menu to a table which displays all registered transactions in the report.

A menu in the top right corner of the table gives the option to upload transactions in XML format. To download all registered transactions in XML format or to register a new BiParty or MultiParty transaction.

In the menu it is also possible for each registered transactions to *delete*, *edit* or *download* the transaction in XML format with a selection to the right.

It possible to select a transaction for editing from both from the *Transactions* tab or from the *Transactions* table.

Information about additional tabs that are not mandatory
These tabs should be used if the relevant information is available.

Foreign Currency

If the *From* or *To* side of the transaction is in foreign currency it needs to be input here.

This would f.x apply if the *Transmode Code* of a reported transaction is a type of *Currency Exchange*. Then it is be necessary to input the amount of foreign currency under either the *From* or *To* side of the transaction depending on if the foreign currency was being bought or sold. This would also apply if funds are being reiceived/sent from/to another country.

Currency Code is required!   Amount is required!   Exchange Rate is required!

Conductor

A *Conductor* is a person carrying out a transaction but not the registered sender, recipient or beneficiary of the funds.

It is expected that the person linked to a reported transaction (like a *signatory* for an account) is also the Person carrying out the transaction (*Conductor).*

When that is the case it is not necessary to also specify this Person as a *Conductor*.

However if that is not the case then the role of *Conductor* becomes important to further specify the transaction.

An example of a *Conductor* would be an employee who makes a deposit on behalf of a business entity.

The registration window is the same as *Party Type Person*.

Additional Info

If the transaction has information related to the internet this can be input here.

This can be f.x. Block/Virtual addresses, devices or IP addresses.

RE relationship

If the relationship of the reported person is considered important details about that can be input here, including when it started and/or ended.

Previous Names

Here it is possible to register a previous name of the person.

Network Devices

This is also available undir Additional Info and is used to register specific network devices used or related to this Person.

Emails

More then one email address can be registered.

Social Media

Information about the social media presence of the person.

Employment history

Information about the employment history of the person can be input here. The incorporation number of the employer should be input in the Employer Identifier field.

Public Exposure (PEP)

If the person being reported is a politically exposed person (PEP) information about this relationship should be registered here. It is necessary to register the country and clarify the function of the person that makes him a PEP. It is also possible to register the date range of this relationship.

Sanctions

If the reported person is flagged during sanctions screening information about the details should be registered here.

Related Person

If it is necessary to register a relationship of the reported person with another person that does not fit within the contraints of the report (f.x. in transactions) it is possible to do that directly here.

This Related Person tab can also used to highlight the relationship of a reported person with another person of interest that is not directly related to the incident being reported such as a family member or a known criminal.

It is necessary to input the reason for this person being included under the comments field.

Additional Information

If it is necessary to provide the FIU with some information about the person being reported that has no particular place in the report then this is the field to use for that purpose.

For more details on the registration of an account or an entity please see the approprite section in the user guide for *Party Type Account* or *Entity*.

Person (NotMyClient)

Below the specification can be seen for a Person that is not a client of the reporting entity.

In order to not limit reporting it is only mandatory to register the name of the Person and DOB.

However it is expected that as much information as is available is registered since only the name and DOB limits the possibilities of FIU-ICE to act.

The field *SSN* is for Icelandic Social ID (Icelandic - Kennitala) only and should always be registered for Persons if available.

The field *Nationality* is also very important if information is available.

For review of the additional fields that are available this can be seen under Person (MyClient).

Party Type - Account

The mandatory fields are different depending on if the Account (My Client) in question is hosted with the reporting entity or not. In general this is the case for at least one side of the transaction.

Account (My Client)

The fields marked in **red** or with an * are mandatory.

The fields circled in red are mandatory. This applies if the Account is registered with the reporting entity.

When registering an Account, Person or Entity it is always possible to select the *Use an existing Person/Account/Entity* ♻ in the top right corner. This is helpful when registering multiple transactions between the same *Person/Account/Entity*.

However this is only connected to the specific report being filled out and is cleared once the report has been submitted to FIU-ICE

Further information on individual fields and mandatory tabs

Is Suspected – It is possible to indicate if only the From or To part of the transaction is considered suspicious.

Account Number – This should be in IBAN format.

Name – If a number of accounts are being reported it can be useful to differentiate between them with a name.

Institution Name – This is the name of the institution where the account is held. The name of the institution were the account is held should always be selected from the drop-down menu that appears if possible.

When the first three characters have been input in this field a selection will appear. This selection is autopopulated by goAML with registered commercial banks.

The institution should be selected from this drop-down menu.

By selecting the institution from the drop-down menu the SWIFT code is automatically entered as it is registered in goAML.

If the institution is not present in the drop-down menu only then should it be entered manually.

Branch – A unique indentifier to give information on where exactly an account is held.

Non Banking Institution?

If the institution has a registered SWIFT or BIC code then this should be left unchecked. If the instution does not have a registered SWIFT/BIC code then this should be checked and the institution code registered.

Institution Code or SWIFT? – For institutions that have a SWIFT code it should be registered. For other institutions an Institution Code should be registered.

If the entity does not have a specific Institution Code then the *Incorporation no.* (*Kennitala*) of the entity should be used.

Account Type – What [type of account](#) is this?

Status Code – What is the current status of the account, is it open, closed etc.

Currency Code – In what currency is the account.

Beneficiary – This applies if the account is f.x. a *Custody acccount*. The name of the beneficiary would be input here.

For a foreign transaction the name of the registered recipient is input here and not in under the Signatory or Entity tab since this is very limited and unverified information.

In many cases often only the name of the intended recipient is present.

Opened – When was the account opened?

Closed – When was the account closed?

Balance – What is the balance of the account on a particular date, it is also necessary to input the date of the account balance.

Account Comments – Specific information about the account itself. This could be f.x. something in relation to the opening or closure of the account, the beneficiary etc.

Related Person
This tab contains information on the connection between *Person* and *Account.* It is not possible to register an *Account* (My Client) without at least one *Signatory*.

Usually the Person connected to the Account is the *Primary Signatory* (Role - Account holder) but the relationship can be different, f.x. if the Account is in the name of an Entity and the Person has procuration for the Account. Also that particular Person is not necessarily the Primary signatory.

The selection of *Is Primary* and the *Account Relation Role* field are specific to the registration of a *Related Person*/*Signatory* but otherwise it is exactly the same as registration for Person.

The *Role* field is a mandatory drop-down list where the exact connection between *Person* and *Account* can be selected.

For more details on the registration of a Person please see the approprite section in the user guide for *Party Type Person*.

Entity

If the account is registered to an Entity then information regarding this must be input under the Entity tab.

More information regarding the registration of entities can be seen under *Party Type – Entity*.

Information about additional tabs that are not mandatory

These tabs should be used if the relevant information is available.

Foreign Currency

If the *From* or *To* side of the transaction is in foreign currency it needs to be input here.

This would f.x apply if the *Transmode Code* of a reported transaction is a type of *Currency Exchange*. Then it is be necessary to input the amount of foreign currency under either the *From* or *To* side of the transaction depending on if the foreign currency was being bought or sold. This would also apply if funds are being reiceived/sent from/to another country.

Conductor

A *Conductor* is a person carrying out a transaction but not the registered sender, recipient or beneficiary of the funds.

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It is expected that the person linked to a reported transaction (like a *signatory* for an account) is also the Person carrying out the transaction (*Conductor*).

When that is the case it is not necessary to also specify this Person as a *Conductor*.

However if that is not the case then the role of *Conductor* becomes important to further specify the transaction.

An example of a *Conductor* would be an employee who makes a deposit on behalf of a business entity.

The registration window is the same as *Party Type Person*.

Additional Info

If the transaction has information related to the internet this can be input here.

This can be f.x. Block/Virtual addresses, devices or IP addresses.

Account Funds

Some types of Accounts (f.x. virtual/crypto accounts) can hold more then one type of currencies. Here it is possible to register the balance of each currency.

Other Related Entities

It is only possible to associate a single Entity to an Account under the Entity tab and that should be the primary account holder only.

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If it is necessary to associate an Entity to an Account without the Entity being the primary account holder it is possible to do so here.

Related Accounts

If there is a specific relationship between accounts such as if one of the accounts is a collection account it can be registered here. Transactions can describe most relationships between accounts.

Network Devices

This is also available undir Additional Info and is used to register specific network devices used or related to this Account.

Sanctions

If the reported Account is flagged during sanctions screening information about the details should be registered here.

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Additional Information

∨ Additional Information #1

* Info Subject is required!

* Info Text is required!

If it is necessary to provide the FIU with some information about the Account being reported that has no particular place in the report then this is the field to use for that purpose.

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Account

Below the specification can be seen for an Account not hosted by the reporting entity.

The only mandatory fields are the *Account Number, Institution Name* and *SWIFT* or *Institution Code*. The Institution Code for most entites, that do not have SWIFT, is the the *Incorporation no* (*Kennitala*).

When filling out a Web report manually the name of the institution were the Account is held should always be selected from the drop-down menu that appears in this field.

When the first three characters have been input in this field a selection will appear. This selection is autopopulated by goAML with registered institutions.

The institution should be selected from this drop-down menu and all domestic institutions should be present.

If he institution is not present in the drop-down menu ONLY then should it be entered manually.

By selecting the institution from the drop-down menu the SWIFT/Institution Code is automatically entered as it is registered in goAML.

For review of the additional fields that are available this can be seen under Account (MyClient).
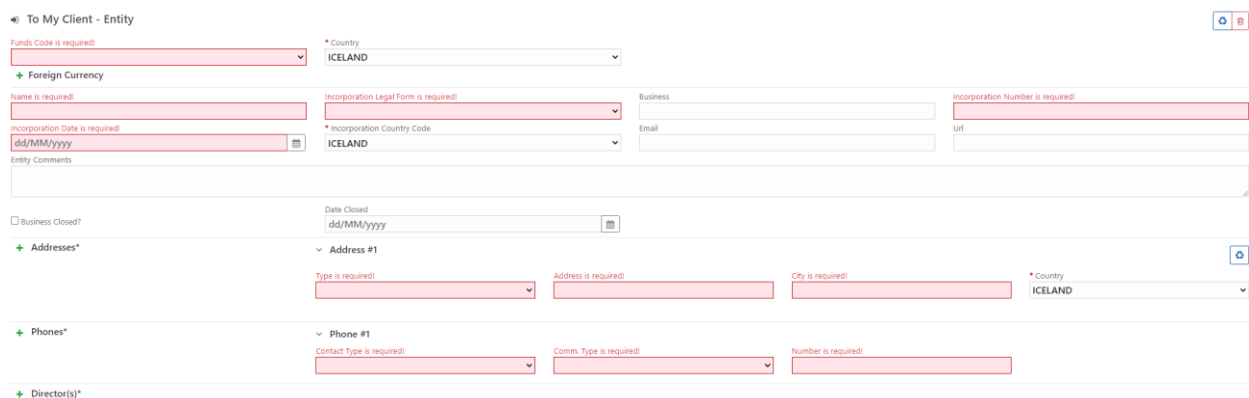
Party Type - Entity

The mandatory fields are different depending on if the Entity (My Client) in question is a client of the reporting entity or not. In general this is the case for at least one side of the transaction should be selected as My Client.

Entity (My Client)

When registering an Account, Person or Entity it is always possible to select the *Use an existing Person/Account/Entity* ♻ in the top right corner. This is helpful when registering multiple transactions between the same *Person/Account/Entity*.

However this is only connected to the specific report being filled out and is cleared once the report has been submitted to FIU-ICE.

Further information on individual fields and mandatory tabs

Is Suspected – It is possible to indicate if only the From or To part of the transaction is considered suspicious.

Name – The legal name of the Entity.

Incorporation Legal Form – Selected from the drop-down list.

Business – What type of business is this? In the example above „Restaurant" would be input here.

Incorporation Number – This would be the Icelandic SSN of the Entity or the corresponding unique identifier in the country of registration.

Phone

Same as Phone with a Person.

Addresses

Same as Address with a Person. In general this should be the legal address of the Entity.

Related Persons

This is used to register information about the role of a *Person* within the Entity.

The registration window is the same as Person with the added field of *Role* at the top which is selected from a drop-down list and is mandatory.

In general a *Person* to be registered with an Entity should be same *Person* that is connected to a reported transaction. If a *Person* that is registered in relation to an Account or Entity is not the *Person* carrying out the transaction then information about a *Conductor* should be provided.

When all of the information has been input press Save at the Report menu on the left of the screen.

For more details on the registration of a person, account or entity please see the approprite section in the user guide for *Party Type Person* or *Account*.

Information about additional tabs that are not mandatory

These tabs should be used if the relevant information is available.

Foreign Currency

If the *From* or *To* side of the transaction is in foreign currency it needs to be input here.

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This would f.x apply if the *Transmode Code* of a reported transaction is a type of *Currency Exchange*. Then it is be necessary to input the amount of foreign currency under either the *From* or *To* side of the transaction depending on if the foreign currency was being bought or sold. This would also apply if funds are being reiceived/sent from/to another country.

Conductor

A *Conductor* is a person carrying out a transaction but not the registered sender, recipient or beneficiary of the funds.

It is expected that the person linked to a reported transaction (like a *signatory* for an account) is also the Person carrying out the transaction (*Conductor*).

When that is the case it is not necessary to also specify this Person as a *Conductor*.

However if that is not the case then the role of *Conductor* becomes important to further specify the transaction.

An example of a *Conductor* would be an employee who makes a deposit on behalf of a business entity.

The registration window is the same as *Party Type Person*.

Additional Info

If the transaction has information related to the internet this can be input here.

This can be f.x. Block/Virtual addresses, devices or IP addresses.

RE relationship

If the relationship of the reported Entity is considered important details about that can be input here, including when it started and/or ended.

Emails

More then one email address can be registered.

Urls

Webpage information can be registered here.

Related Entities

It is possible to register a relationship between two or more Entities.

This would mainly apply with regards to ownership.

It is possible to register an Entity as an owner when an Entity is owned in part or wholly by another Entity. Another example of a relation between Entities could be that the same Person owns both Entities but for some reason (f.x. this Person is UBO) this Person is not registered as a Signatory for either Entity in the report.

The relationship can be specified as well as the *Share Percentage* if it applies to the relationship.

A *Comments* field can also be used to clarify the relationship or provide additonal information.

Network Devices

This is also available undir Additional Info and is used to register specific network devices used or related to this Entity.

Identification

For Entities this would probably be some sort of electronic ID used for verification.

Any other information that is available about the ID is appreciated.

To register an ID it is mandatory to input the *Type*, *Number* and *Issue Country*.

Sanctions

If the reported Entity is flagged during sanctions screening information about the details should be registered here.

Additional Information

If it is necessary to provide the FIU with some information about the Entity being reported that has no particular place in the report then this is the field to use for that purpose.

Entity (NotMyClient)

Below the specification can be seen for an Entity that is not a client of the reporting entity.

The *Name*, *Incorporation Number* and *Incorporation Country* are mandatory.

It is expected that as much information as is available is registered.

When registering an Account holding Entity this also applies.

If this information is not available f.x. in relation to a foreign transaction where only the supplied name of the recipient is provided it is permitted by FIU-ICE to register the name of the recipient in the Beneficiary field in the Account registration instead of the Entity/Signatory tab where more information is required.

For review of the additional fields that are available this can be seen under Entity (MyClient).

Finishing and submitting a report

When all necessary information has been input depending on if this is a BiParty or MultiParty transaction it needs to be reviewed if this report is ready to be submitted or not.

If everything is marked in **green** in the Report menu on the left of the screen it is possible to submit the report, otherwise the option to submit is greyed out.

By choosing *Submit Report* the report is sent to FIU-ICE for review. The status of the report can be viewed in the goAML Web interface by selecting *Submitted Reports* and *Web Reports*.
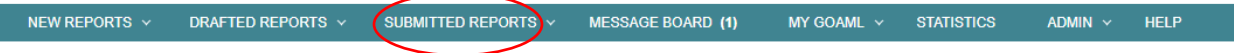
Status	Submitted On	#
Processed	17/02/2020	
Reverted	17/02/2020	
Processed	14/02/2020	
Processed	04/02/2020	

Activity based report

If the report is not related to certain transactions or attempted transaction then a *SAR* (Activity based report) can be submitted.

Activity based reports should not be filed by reporting entities as their main reports without the prior approval of FIU-ICE and in general a transaction based report should always be used if possible.

For the most part the menus and registration is the same as with an STR except that the *Transaction* part of the STR has been replaced by an *Activity* part where it is possible to register Accounts, Persons and Entities.

Therefore most of the fields have already been covered when reviewing the process of filing a STR.

Further information on individual fields

Reason – Here a detailed description needs to be provided of the events being reported. Since there are no transactions being registered to suppliment information in this field this needs to be as detailed as possible.

Reporting Entity Reference – This a reference number which is relevant for the Reporting Entity, f.x. from a separate case system. A value must be input here and this is fully decided by the Reporting Entity.

The *Activity* registration window is similar to a *MultiParty* Transaction which has already been described without the specific fields related to transactions.

When a Person/Account/Entity has been selected the top row for the registration is the following fields :

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Reason – Why is this particular *Party* being reported? What is the connection of the *Party* to the reported activity? This field is very important to specify this since there is no transaction to indicate the involvement of each registered Person/Account/Entity

This should be kept short (a few words or a single sentence at the most), f.x. recipient of funds, buyer of goods, applicant for business etc. Additional information should be entered in the *Party Comments* field if needed.

This Field is not mandatory on the Web interface for technical reasons so it is enforced by a Business Rule.

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Comments – For any additonal information on the *Report Party*.

The *Party Types* are the same as have already been described in detail above in relation to filing a transaction based report or STR. For more details view the sections in this guide for *Party Type Person* , *Account* or Entity.

Due to the more unstructed information in an Activity report and to not hinder reporting the mandatory fields are few. However it is expected by FIU-ICE that as much information as is available is registered.

Goods and Services tab

If the activity is related to any type of goods or service then details of that can be input here. An example would be if a person offers some high value items for sale but no transaction takes place since they are thought to be the proceeds of crime. Another example could be a certain real estate or vehicle that is involved in the activity being reported.

Please input as much information as is available about the item in question.

Appendix

More detailed information about Funds Codes, Account Types and Transmode Codes can be seen on the following pages.

Code

Funds Code

This describes the state of funds in the beginning and end of a *BiParty* transaction.
In a *MultiParty* transaction this describes the state of funds with each reported Party.

Account
The concept of an Account is very broad and is any form of funds that is not classified as Cash or Winnings
An Account Type is registered to give accurate information of the funds
The different Account Types are listed under a seperate sheet in this document

BAAC   **Account**

Cash
All types of currency (notes) are registered as cash and the specific type of currency should be listed under foreign currency on either the From or To side of the transaction depending on the direction of the currency exchange

REI   **Cash**

Winnings
When any sort of winnings are payed out.
This can be from any kind of lottery, electronic gambling or slot machines.
Usually this is some sort of token the winner needs to exchanges to receive the winnings

WIN   **Winnings**

Code	Account Type

The concept of an account is very broad, almost anything that is numeric, in goAML as can be seen regarding the various account types and most funds originate from a type of an account.

If the *Funds Code* is not *Cash* or *Winnings* then an appropriate account type should be available for selection

Credit Card
CCAC   **Credit Card**

Currency
CUAC   **Currency**
For such Accounts it is necessary to register the type of Currency

Custody
Some Reporting Entities hold Accounts for a special purpose and are not owners of the funds
This would in general mostly be related to the practice of Lawyers
For such Accounts it would also be necessary to register a **Beneficiary**
CUSAS   **Custody**

Debit
DEB   **Debit**
This is the most common Account Type where in most cases persons receive Debit Cards to allocate funds from the Account

Digital Wallet
This is to be used for Virtual/Crypto currency Accounts
This is however not limited to only those Accounts and should also be used for various other kinds of Account that are related to activity online
In general these sort of online Accounts are preloaded with funds from another source to be allocated for a special purpose
Examples of online Accounts would be a Paypal Account or an Account with an Online Gambling Company
DIGI   **Digital Wallet**

Loans	
The numeric structure of a loan is often very similar to a bank account	
This account type allows for the registration of a specific loan	
LOAN	**Loan**
This would apply when a reported transaction is related to a loan such as an additional loan payment.	
In general the transmode code *Loan / Repayment* is associated with such an account.	

Foreign	
FOR	**Foreign**
Any kind of Account with a financial institution in another country that is either receiving og sending funds in relation to a reported transaction.	
Usually there is limited amount of information available	

Prepaid/Payment Card	
PPAC	**Prepaid/payment Card**
Any kind of Card that is loaded with funds prior to use	

Savings	
SAV	**Savings**
Designated for savings	

Bonds	
BON	**Bonds**
Designated for Bonds	

Shares	
SHA	**Shares**
Designated for Shares	

Securites	
SEC	**Securites**
Designated for Securites when other types of Securites (Shares and Bonds) do not apply, if this is choosen please specify the type of Securities.	

Derivatives	
DER	**Derivatives**

Designated for Derivatives such as future or option contracts

Other Financial Instrument
OFI   **Other Financial Instrument**
In general this is to be used as an exception and more details need to be specified along with the transaction

Code   Transmode Code

In a Biparty transaction this describes the method used to transfer funds from one *Party Type (Person, Account or Entity)* to another *Party Type*.
In a *Multiparty* transaction this describes the transaction method in general but without direction.

ATMs

All possible transactions made in an ATM

ATMD   **ATM – Deposit**
Cash deposit in Person

ADMW   **ATM – Withdrawal**
Cash withdrawal in Person

ATMC   **ATM - Currency Exchange**
The exchange of funds from one currency to another in Person.

ATME   **ATM - Electronic Transfer**
Domestic transfer of funds between bank accounts or various payments made

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Branch

All possible transactions made by an reporting entity on behalf of a Person
*There are many different kinds of **Account types** so this is not limited to the most common bank accounts*

BRCU   **Branch – Currency Exchange**
The exchange of funds from one currency to another in Person.

BRDE   **Branch – Deposit**
Deposit in Person, most common with cash

BRWI   **Branch – Withdrawal**
Withdrawal in Person, most common with cash

BRFO   **Branch - Foreign Transaction**
Transfer of funds to an account in another country

BREL   **Branch - Electronic Transfer**
Domestic transfer of funds between accounts or various payments made

Card payments		
*Transactions where any kind of **Debit**, **Credit** or **Prepaid Card** was used*		
*The type of Card is selected as an **Account Type***		
POSP	**POS - Card present**	
	All transactions made at a POS terminal where the Card was present	
POSN	**POS - Card not present**	
	All transactions made at a POS terminal where the Card was not present	
ONPU	**Online purchase**	
	All transactions made online by entering the details of a Card	

Foreign Transaction received	
*Foreign transaction that are sent are classified under **Branch** or **Online Banking***	
FOR	**Foreign Transaction received**
	All transactions (except Money Order) where money is received from another country
	In general this would be SWIFT and SEPA payments. Another example would be deposits made to a Credit Card from a foreign entity such as Paypal.

Loans	
LORE	**Loan / Repayment**
	All transactions related to regular or additonal payments to loans

Material Transfer	
When valuable items or fixed assets are transferred between parties	
This can be part of a larger transaction f.x. when real estate is bought and a car is used as part of the payment.	
MATR	**Material Transfer**
	Various goods and services

Money Order	
MONS	**Money Order – Sent**
	All transactions where funds are sent with Money Order to another party
MONR	**Money Order – Received**
	All transactions where funds are received with Money Order from another party

Online Banking	
INTE	**Online Banking - Electronic Transfer** *All transactions where Internet banking is used to transfer funds between domestic accounts*
INTF	**Online Banking - Foreign transaction** *All transactions where Internet banking is used to **send** funds to an account in another country*

Virtual Currency **The transactions below detail all possible transactions of funds related to Virtual Currencies** *The Account Type for Virtual Currencies is Digital Wallet*	
VIRD	**Virtual Currency – Deposit** *The deposit/exchange of VC in Person in an ATM or Branch*
VIRW	**Virtual Currency – Withdrawal** *The withdrawal of VC in Person in an ATM or Branch*
VIRE	**Virtual Currency - Electronic Transfer** *The transfer of funds between VC accounts or the transfer of funds from/to a VC account from/to another type af account*

Business Rules

The Business Rules (BR) are applied when a report has passed Schema validation and has been retrieved from the Web by goAML.

The BR´s are a second level of enforcement and they are not visible in the Schema.

Therefore reporting entities need specific information regarding the BR´s that have been put in place, especially those that report with XML uploads, since breaking them will result in the rejection of a report.

1. ~~**AIF/ATL – FIU/Entity Ref Number mandatory** [INACTIVE]~~
   ~~When filing an AIF or ATL it is necessary to fill in either the FIU Reference field or Reporting Entity reference field.~~
   ~~This can be found in the XML under the Report node~~
   - ~~Node - *report*~~
   - ~~Field - *fiu_ref_number*~~
   - ~~Field - *entity_reference*~~

   ~~More information regarding specifications can be seen here.~~

   ~~The report will be rejected with the following message if this BR is broken :~~

   ~~*FIU Reference field cannot be blank for this report type*~~

2. **Missing Identification for My Client**
   When filing a report it is mandatory to input *Name* and *Date of Birth* for My Client (Person) in the Schema.
   This BR enhances data quality by also enforcing that at least an SSN or ID is also registered for this Person as a discriminator in a BiParty transaction.

   - Node - *t_person_my_client*
       - Field - *ssn*
     Or

   - Node - *t_person_identification*
       - Fields – *type*, *number*, *issue_country*

   More information regarding *type (identifier_type)* can be found in the Schema documentation in chapter 5.5

   The report will be rejected with the following message if this BR is broken :
   Both SSN and Identification for My Client cannot be empty

3. **Reason Missing for SAR/STR/TFR**
   It is necessary to fill in the field Reason on the Report Cover.
   This is only mandatory for the report types of SAR, STR and TFR.

   - Node - *report*
     - o Field – *reason*

   The report will be rejected with the following message if this BR is broken :

   Reason field cannot be blank for this report type

4. **Not My Client x2 allowed for Currency Transactions, Branch Deposits and/or To Foreign Accounts)**
   When reporting a BiParty transaction it is mandatory to input either the From or To party as My Client, possibly both.
   This BR is allows reporting entities to report transactions without selecting the My Client specification for both the From and To parties if the transaction being reported is a currency exchange (transaction mode) and/or if the To Account is a foreign Account and/or if the report type is ATL (Only after prior approval of FIU-ICE).

   This applies if :

   - Node – *transaction*
     - o Field – *transmode_code*
       - ▪ Code – *ATMC, BRDE or BRCU*

   And/or

   - Node – *t_account*
     - o Field – *personal_account_type*
       - ▪ Code – *FOR*

   And/or

   - Note – *report*
     - o Field – *report_code*
       - ▪ Code - *ATL*

   The report will be rejected with the following message if this BR is broken :

   At least one party in each transaction needs to be My Client.

5. **Transaction location mandatory for Commercial and Savings Banks**
   For reporting entities that are either a Commercial or Savings bank it is mandatory to fill in the field *location* when registering a BiParty transaction.

   - Node - *transaction*
     - o Field – *transaction_location*

   This applies for all Transaction Modes that take place in a Branch or when an ATM is used and they are the following :

   - *Branch Deposit*
   - *Branch Withdrawal*
   - *Branch Foreign Transaction*
   - *Branch Electronic Transfer*
   - *Branch Currency Exchange*
   - *ATM Deposit*
   - *ATM Withdrawal*
   - *ATM Electronic Transfer*
   - *ATM Currency Exchange*

   The report will be rejected with the following message if this BR is broken :

   Transaction location must be registered for each transaction.

6. **Reason Missing for Report Party**
   It is necessary to specify the reason for reporting under each registered Person, Account or Entity in the field Reason under Activity – Report Parties when filing a SAR.

   This applies if :

   - Node - *report*
     - o Field – *report_code*
       - ▪ Code – *SAR*
   - Node – *report_party_type*
     - o Field – *reason*
       - ▪ Must have text

The report will be rejected with the following message if this BR is broken :
Reason missing for Report Party -
It is necessary to specify the reason why each registered Person, Account or Entity is being reported for this report type.
This is done in the field Reason under Activity – Report Parties for each registration.