



**FINANCIAL MONITORING UNIT (FMU)**  
**GOVERNMENT OF PAKISTAN**  
2<sup>ND</sup> FLOOR, SBP MAIN BUILDING, I.I. CHUNDRIGAR ROAD, KARACHI

# **Guidelines for the Reporting Entities on filing of Currency Transaction Reports (2021)**

**Issued By:  
Financial Monitoring Unit**

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## I) Introduction

In order to develop a quality financial intelligence report, it is imperative that complete, accurate and updated information is provided in the Currency Transaction Reports (CTRs) filed by Reporting Entities (REs). The objective of these guidelines is to improve the quality of the CTRs being submitted to FMU by providing guidance to the REs related to reporting of CTRs. These guidelines are being issued pursuant to Section 7 of the Anti-Money Laundering Act, 2010 applicable to the Reporting Entities (REs) which includes financial institutions and designated non-financial businesses and professions (DNFBPs) as defined under Section 2 of the act.

## II) Currency Transactions Report

Currency Transaction Report or CTR means report on cash transaction exceeding such amount as may be specified by the National Executive Committee by notification in the official Gazette. Threshold for reporting currency transaction report is Rupees two million or above. It is mandatory for the reporting entities to report only those cash transactions as CTR meeting the notified threshold.

## III) Legal Obligation and Timing of Reporting of CTRs under AML Act 2010

In terms of Section 7(3) of AML Act, 2010, all CTRs shall, to the extent and in the manner prescribed by FMU, be filed by the reporting entities with the FMU immediately, but not later than seven working days, after the respective currency transaction. As per notification dated 21<sup>st</sup> January 2015 related to threshold of CTRs, the minimum amount for reporting CTR to Financial Monitoring Unit under section 7 of the Anti-Money Laundering Act-2010 is two million rupees.

## IV) Exemption for Reporting of CTRs

Currency Transactions amongst the financial institutions, and between financial institutions and the following categories of entities, are exempted from the reporting requirements of clause 5(1) of AML Regulation, 2015:

- a) a department or agency of the Federal Government or a Provincial Government; or
- b) a Local Government; or
- c) a statutory body.

## V) Reporting Entities

As per Section 2(xxxiv) of AML Act, 2010 reporting entity includes “financial institutions” as defined in Section 2(xiv) and “Designated Non-Financial Businesses & Professions” as defined in Section 2(xii).

(xiv) “**financial institution**” includes any person carrying on any one or more of the following activities, namely:-

- (a) acceptance of deposits and other repayable funds from the public;
- (b) lending in whatsoever form;
- (c) financial leasing;
- (d) money or value transfer;
- (e) issuing and managing means of payments including but not limited to credit and debit cards, cheques, traveller’s cheques, money orders, bank drafts and electronic money;
- (f) financial guarantees and commitments; and
- (g) trading in —
  - (i) money market instruments;
  - (ii) foreign exchange;

- (iii) exchange, interest rate and index instruments;
- (iv) transferable securities;
- (v) commodity futures trading;
- (vi) participation in shares issues and the provision of services related to such issues;
- (vii) individual and collective portfolio management;
- (viii) safekeeping and administration of cash or liquid securities on behalf of other persons;
- (ix) investing, administering or managing funds or money on behalf of other persons;
- (x) insurance business transactions;
- (xi) money and currency changing; and
- (xii) carrying out business as intermediary;
- (xii) **“Designated non-financial businesses and professions or DNFBPs”** mean the following persons, namely:-
  - (a) real estate agents, including builders and real estate developers, when performing the prescribed activities in the prescribed circumstances and manner;
  - (b) dealers in precious metals and precious stones, including jewellers and gem dealers, when performing the prescribed activities in the prescribed circumstances and manner;
  - (c) lawyers, notaries, accountants and other legal professionals who carry out monetary transactions for their clients concerning the following activities:-
    - (I) managing, operating, buying and selling of real estate, legal persons and legal arrangements and preparing documents therefor;
    - (II) managing of client money, securities or other assets;
    - (III) managing bank, savings or securities accounts; or
    - (IV) organizing contributions for the creation, operation or management of companies;
  - (d) trust and company service providers, when they carry out monetary transactions or services for a client concerning the following activities:-
    - (I) acting as a formation agent of legal persons;
    - (II) acting as or arranging for another person to act as a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal persons;
    - (III) providing a registered office, business address or accommodation, correspondence or administrative address for a company, a partnership or any other legal person or arrangement;
    - (IV) acting as or arranging for another person to act as a trustee of a trust or performing the equivalent function for another form of legal arrangement; and
    - (V) acting as or arranging for another person to act as a nominee shareholder for another person; and
  - (e) such other designated non-financial businesses and professions as may be notified by the Federal Government.

## **VI) Record Keeping for CTRs**

Section 7(4) of the AML Act 2010 states that “Every reporting entity shall keep and maintain all record related to STRs and CTRs filed by it for a period of at least ten years after reporting of transaction under sub-sections (1), (2) and (3)”.

## **VII) Confidentiality of Information/ Tipping Off**

The reporting entities are required to ensure secrecy and maintain confidentiality for reporting of STRs / CTRs to FMU. In terms of Section 34 (1) of AML Act, 2010, "The directors, officers, employees and agents of any reporting entity, financial institution, non-financial business or profession or intermediary which report a suspicious transaction or CTR pursuant to this law or any other authority, are prohibited from disclosing, directly or indirectly, any person involved in the transaction that the transaction has been reported."

Further, the violation of Section 34 (1) of AML Act, 2010 is a criminal offence and shall be punishable by a maximum term of ten years imprisonment or a fine which may extend to two million rupees or both.

### VIII) The Process of Filing CTR to FMU

As per the procedure defined by FMU, CTRs/STRs are filed through the goAML, which is a state-of-the-art all-encompassing AML suite for data collection, analysis and dissemination. The goAML is a global response provided by UNODC to assist member states to combat Money Laundering (ML) and Terrorism Financing (TF) with a specialized suite of tools developed to cater the unique requirements of Financial Intelligence Units.

Under the powers conferred in the Section 7(2) of AML Act, 2010 to FMU which states that the reporting of STRs/CTRs is obligated on the reporting entities ‘to the extent and in the manner prescribed by the FMU’, In this regards, FMU successfully implemented the automated reporting system i.e. goAML w.e.f January 01, 2019 and all the reporting entities are required to submit STRs and CTRs electronically through the goAML application. The hardcopies of CTR and STR reporting have already been discontinued since January 01, 2019 (CTRs) and January 01, 2020 (STRs) respectively.

To report CTRs/STRs, every reporting entity needs to first register on goAML portal and after the registration request is processed by FMU, the reporting entity would be able to access the reporting module of goAML. For the purpose of registration and reporting, the reporting entities can access goAML through following web links:

<https://www.fmu.gov.pk/goaml>

<https://goamlweb.fmu.gov.pk/PRD/Home>

### IX) Types of Currency Transaction Reports

To facilitate CTRs reporting, CTRs have been categorized in two types on goAML as provided below:

- a. **Currency Transaction Report – CTR** (To be reported by all Financial Institutions and DNFBPs involving a cash transaction of Rs.2 million or above)
- b. **Currency Transaction Report-Aggregate – CTR-A** (To be reported by Exchange Companies only for transactions involving multiple currencies aggregating Rs. 2 million or above)

Reporting entities are required to select the correct report type while filing CTRs with FMU as the report type cannot be changed after it is created on goAML. The difference between the two report types is further elaborated through the comparison of CTR and CTR-A given below:

| Criteria                                    | CTR  | CTR-A   |
|---|--|---|
| <b>Who can file</b>                         | All Reporting Entities                                   | Exchange Companies only   |
| <b>Number of currencies involved</b>        | Single Currency  | Multiple Currencies   |
| <b>Number of Transactions in the Report</b> | Can contain one or multiple CTRs in a report             | Will contain at least two transactions aggregating Rs. 2 million or above in a report |
| <b>Parties Involved in the Report</b>       | Transactions related to multiple parties can be reported | Transactions related to a single party will be filed in a report                      |

|                            |  |  |
|----------------------------|--|--|
| <b>Type of transaction</b> | Cash transactions of Rs. 2 million or above involving Cash Deposit, Cash Withdrawal, Currency Exchange, Wire transfer, etc | Currency exchange transactions of more than one foreign currencies by a single person at a time aggregating Rs. 2 million or above |
|----------------------------|--|--|

## X) Parties to be reported in goAML

All CTRs will be filed as bi-party transaction in goAML which is based on the concept of flow of funds involving reporting of both the parties in a transaction, “From Party” the originator of funds and “To Party” the beneficiaries of funds.

It is important to select relevant party type involved in transaction while filing CTR to FMU. Following are three parties which can be reported in goAML.

- A. Person
- B. Account
- C. Entity

The parties can either be client of the reporting entity or not, and accordingly mandatory field requirements can vary. Following fields are mandatory for parties in goAML for CTR reporting:

### A. Person:

| <b>My Client</b>     | <b>Not My Client</b> |
|----------------------|----------------------|
| First Name           | First Name           |
| Last Name            | Last Name            |
| Father/Husband Name  | Father/Husband Name  |
| Gender               | Gender               |
| Date of Birth        | Date of Birth        |
| CNIC/Passport Number | CNIC/Passport Number |
| Nationality          | Nationality          |
| Occupation           | -                    |
| Phone / Cell Number  | Phone / Cell Number  |
| Address              | Address              |

### B. Account:

| <b>My Client</b>               | <b>Not My Client</b>           |
|--------------------------------|--------------------------------|
| Account Number                 | Account Number                 |
| Account Title                  | Account Title                  |
| Institution Name               | Institution Name               |
| Branch                         | Branch                         |
| Swift Code or Registration No. | Swift Code or Registration No. |
| Account Type                   | -                              |
| Account Status                 | -                              |
| Account Currency               | -                              |
| Account Opening Date           | -                              |

|   |   |
|---|---|
| Account Signatory (Detail of account holders/operators)         | - |
| Entity and Directors/Owners details (In case of Entity Account) | - |

**C. Entity:**

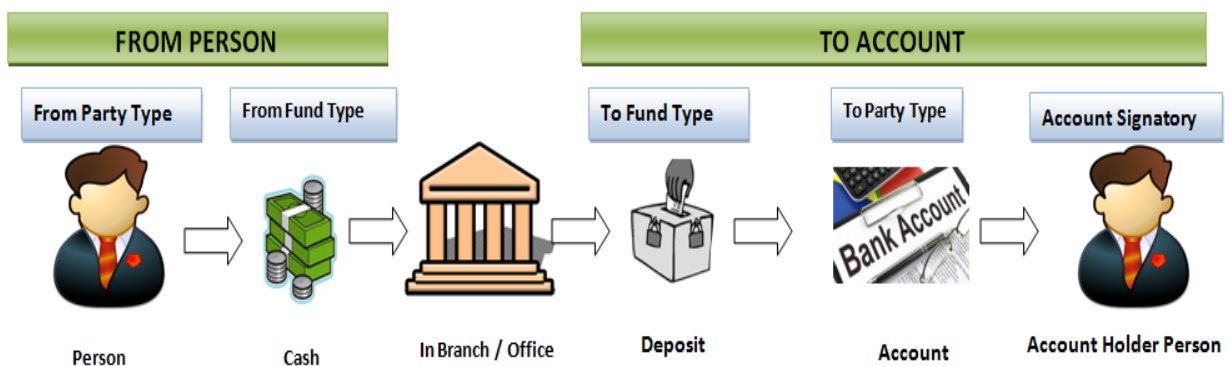
| My Client  | Not My Client  |
|--|----------------|
| Name of Entity   | Name of Entity |
| Entity Type  | -              |
| Nature of Business                                       | -              |
| Registration Number/Tax No/CNIC of Proprietor or Partner | -              |
| Phone / Cell Number                                      | -              |
| Address  | -              |
| Directors/Owners details                                 | -              |

Only entity name is mandatory for party type “Not My Client Entity”, however, if further information is available with reporting entity than providing merely entity name is strongly discouraged.

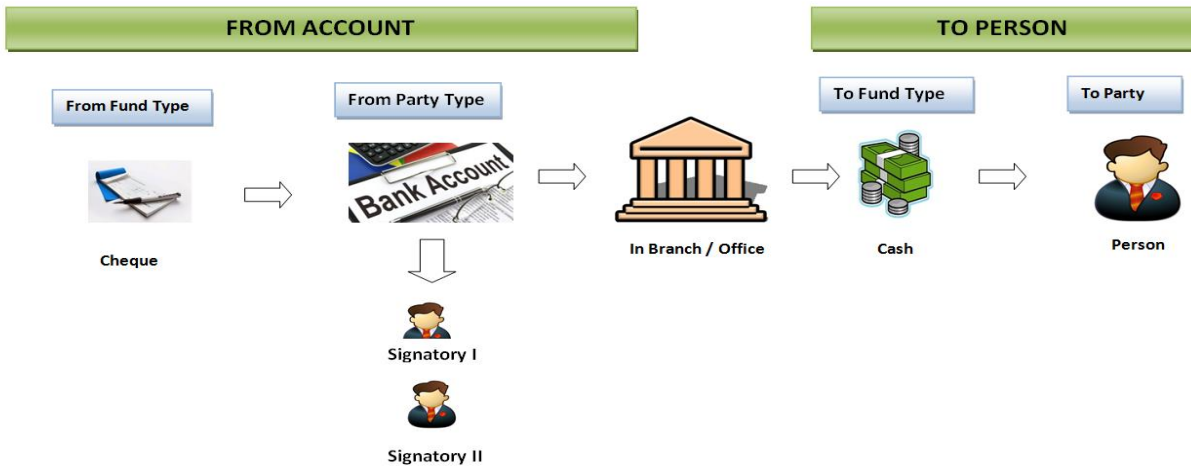
**XI) Selection of Fund Code**

The fund code in a transaction represents the nature of transaction /type of funds involved. For every transaction, the reporting entity has to provide fund codes on both sides of the transactions that is "From" and "To" sides. However, similar fund code cannot be provided on both sides of transaction. Following are the pictorial illustrations of reporting cash transactions on goAML:

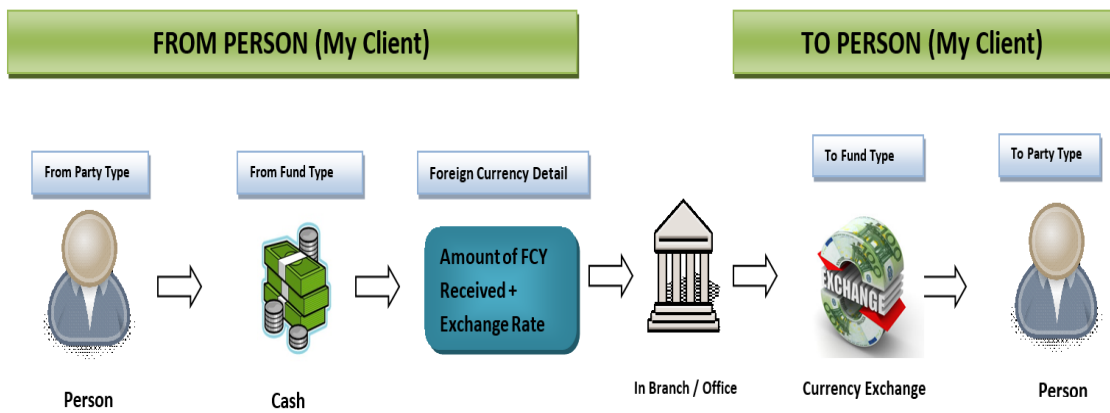
**1. Cash Deposit in a Personal Account**



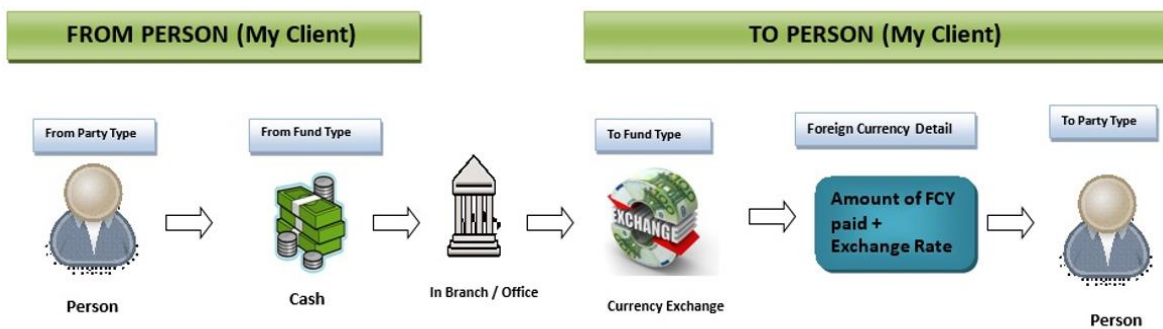
**2. Cash Withdrawal from a Joint or an Entity Account**



**3. Foreign Currency Purchased by Exchange Company in Cash**

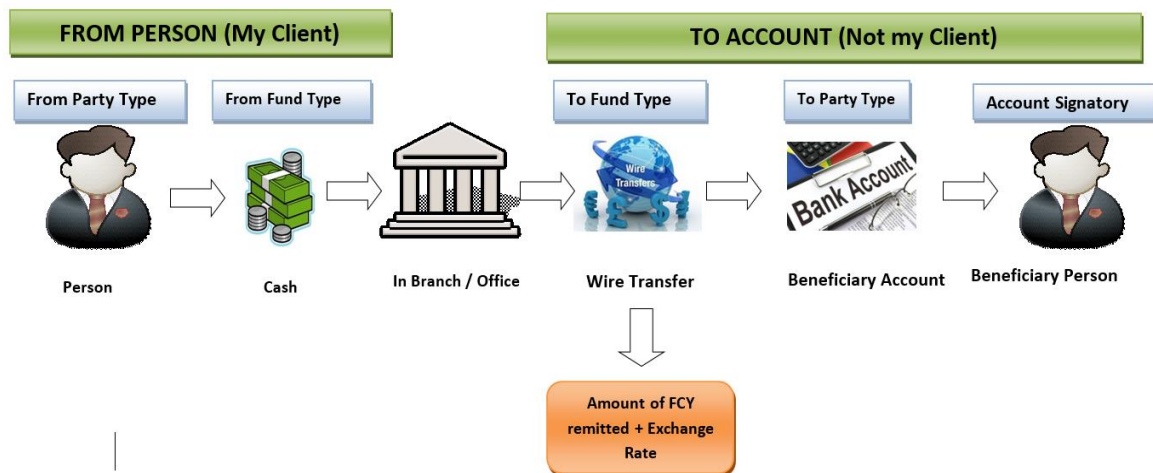


**4. Foreign Currency Sold by Exchange Company in Cash**

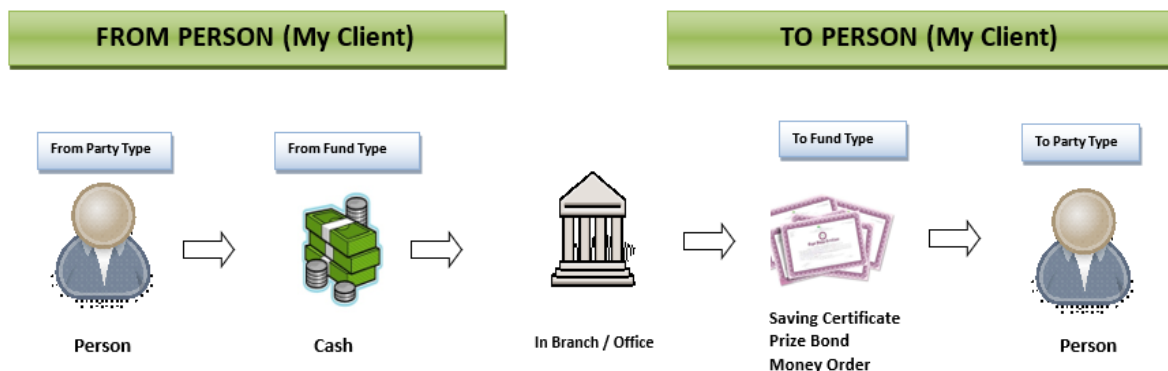




## 5. Outward Wire Transfer Through Cash



## 6. Purchase of Certificate/Prize Bonds/Money Order



## XII) General Guidelines

Following are general guidelines which may be complied to ensure the quality of CTR reporting by the Reporting Entities:

- Only those cash transactions are required to be filed as CTR which meet the threshold of PKR 2 million and above.
- Reporting entities shall not report account to account transactions, account to entity transactions and entity to account transactions as CTR in goAML.
- If an account of an entity is being reported as “My Client”, detail of entity along with all the Sole Proprietor/Partners/Directors/Trustees is also to be provided in CTR. Further, the entity information needs to be provided in entity tab within the Account party type.
- While reporting an account having multiple signatories in a cash transaction, it is mandatory to provide the detail of all signatories along with their necessary information.

- If a transaction involves foreign currency, foreign currency node needs to be created on To/From side of the transaction where the foreign currency was involved.
- The reporting entities need to take extra care for typo errors in the fields like transaction date, amount and CNIC/Passport number. Any data quality issues shall be eliminated prior to submission of the report. The reporting entity is encouraged to have a four-eye concept as to ensure the quality of reporting.
- Attachments and indicators are not required for CTRs.
- No information shall be provided in the Conductor Tab. The information related to the person conducting the transaction is required to be filed on either “From/To” side depending on the nature of transaction.
- Dummy values, hyphen (-), N/A or any other such value shall not be provided in mandatory as well as optional fields. Reporting entity shall recheck the data for any dummy and incorrect values prior to submission of reports to FMU. A mechanism must be developed by the reporting entity to ensure data quality to avoid any subsequent follow ups and violations.
- Complete names along with correct spelling must be provided in the report fields and avoid use of abbreviation in fields like reporting district, province/state and city.
- The information of parties shall be provided in the respective party tabs like person information, account information and entity information be provided in person tab, account tab, and entity tab respectively.
- Country information on both “From” and “To” sides is mandatory for each transaction. So, correct country name needs to be selected in both “Source Country” field and “Destination Country” field while reporting cross-border transactions.
- The reporting entities are encouraged to map non-mandatory fields too like email address, employer name, tax number etc. if such information is available in their systems. Further, the reporting entities shall periodically review their CTRs XML files as to check for any errors or incorrect mapping of fields.
- Reporting entities are required to provide their own system generated transactions number, in the field of transaction number in goAML, so the transaction can be traced back as and when required.

### **XIII) Rejection of CTRs**

FMU reserves the right to reject the CTRs filed with incomplete information/ technical deficiencies or not meeting the basic requirements of goAML. The CTRs submitted on goAML passes through two filters for final acceptance:

- a. Data Validation by the system to check the structure of report
- b. System based rules developed by the FMU in light of above guidelines

It is pertinent to mention here that FMU keeps track of rejected and accepted CTRs filed by the reporting entities. FMU also provides the required guidance against the queries raised by the reporting entities via goAML Help Desk and Message Board.

#### XIV) Resubmission of Rejected CTRs

All the reporting entities are required to re-submit rejected CTRs promptly. The rejected reports shall be treated as non-reported CTRs unless the same is submitted again within due time. In this regard, following points shall be ensured by the reporting entities:

- The rejected CTRs created manually shall be reverted and resubmitted with same goAML ID. Reporting entities are instructed not to create a new report for resubmission of rejected CTRs. However, if the CTR is submitted through XML upload, it would not be possible to revert the rejected report and the report would be required to be uploaded again after necessary corrections resulting in generation of a new report ID.
- If the CTR is rejected due to wrong selection of report type then reporting entity should create new report, as report type cannot be changed after creation.
- Each rejected CTR shall be submitted after necessary correction indicated by the FMU in the reason for rejection without delay.
- No submitted CTR shall be considered as reported CTR unless the reporting entity receives acknowledgment of CTR acceptance by FMU through message board on goAML.
- Reporting entities shall ensure to save the acknowledgments from the message board. These acknowledgments will be archived after 30 days (or any period as defined by FMU) and FMU will not provide record of submitted CTRs to any reporting entity.
- Further, the accepted reports will reflect in goAML login of the reporting entity maximum for one day or any period as defined by the FMU. It is the responsibility of the reporting entity to maintain its record for reports submitted on goAML. FMU will not provide any information required for the purpose of audit or any other related purpose.

#### XV) Use of Message Board for Internal Coordination

All the correspondence regarding the CTR/STR issues, would be made on Message Board of goAML. If any reporting entity has not received acknowledgment of “Processed CTR”; Reporting Entity may request FMU to re-generate the message of acknowledgment on message board.

The compliance of these guidelines must be ensured by all the reporting entities, the violations would be shared with respective regulator as compliance case for appropriate action at their end and/or the enforcement action shall be initiated under the provisions of AML Act, 2010.

#### **Contact Details for queries**

For information or assistance on reporting of CTR, the contact details are available on following link:  
<http://www.fmu.gov.pk/contact-us/>

Further the goAML related queries may be forwarded to [goamlhelpdesk@fmu.gov.pk](mailto:goamlhelpdesk@fmu.gov.pk) and general FMU matters may be emailed at [info@fmu.gov.pk](mailto:info@fmu.gov.pk).