



Frequently Asked Questions Related to STR-TBML Reporting





In addition to detailed step-by-step STR-TBML guidebook, Following are some FAQs prepared for better understanding of REs to Report STR-TBML

1. Can I report other scenarios related to money laundering (ML) and terrorist financing (TF) predicate offences in the STR-TBML?

REs should file reports in the STR-TBML exclusively when their suspicions pertain specifically to Trade-Based Money Laundering (TBML).

2. Can a “Person” be selected as a party while furnishing transaction information on either the 'From' or 'To' side of the transaction?

Typically, in trade transactions, a natural person is not a party directly, except in the case of Afghan Trade. Under the Foreign Exchange (FE) Manual, authorized dealers are permitted to accept cash convertible currencies brought over their counter by exporters and convert these at the prevailing exchange rate applicable for normal export proceeds. The converted amount is then credited to the PKR account of the exporter.


3. Can an “Entity” be selected as a party while furnishing transaction information on either the 'From' or 'To' side of the transaction?

The RE may choose the "Entity" party type when they lack information about the counterparties' account details, such as when the suspicion arises during the scrutiny of trade documents the trade transaction status is incomplete, etc. However, selecting the "Entity" party type is not allowed if the RE claims that the information is not available with its compliance department but might be available with the relevant trade division.

4. Is it mandatory to fill in foreign currency (FCY) information while reporting a trade transaction? Which side's information should be provided?

The FCY (Foreign Currency) option is available on both sides of the transaction (From & To) when filling out the transaction information in STR-TBML. It is mandatory to provide the FCY tab information on at least one side of the transaction, depending on the flow of funds. Any report submitted without the FCY tab information or with incorrect details on the wrong side of the transaction will be rejected. Repeated rejections may result in the initiation of a compliance case against the RE. REs are advised to refer to the table in the “Funds and Party Type Selection” section of the guidebook for detailed guidance.

5. What should the RE do if they want to report an additional related party (Person, Account, or Entity) that is not directly involved in the trade transaction (From/To)?

The RE can provide information on related parties by using the multiparty option  when reporting STR-TBML on the goAML portal. This is in addition to the information provided in a bi-party transaction. The multiparty option can also be selected in cases similar to STR-A, where no trade data is available with the RE. Multiparty option can be selected solely where transaction status is incomplete, and



counterparty yet not identified. For example, if an importer/exporter attempts to open an account and discloses their business as import/export, but during initial screening, the RE discovers adverse information about the prospective customer's trade activities, the RE may form a reasonable suspicion and report the matter to FMU. In such cases, the RE can choose the multiparty option, provide generic details (i.e. one as amount, etc.) in the mandatory fields, include transactional comments, create the party, attach relevant documents, and file the report, etc.

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